Name	Letter #	Comment #	*Response to Comments – Notice of Intent (Federal Register), December, 2015*		
			Comment Text	**Comment Code Name**	**Response Text**
Rick Ellison	1	1	As a lifetime resident of the state of Utah, I wish to express my opinion in favor removing domestic sheep allotments on the North Slope of the Uintah Mountains.	Position, No Rationale	
Rick Ellison	1	2	I have seen the devastating results of wild sheep mixing with domestic sheep along the Wasatch Front. A once healthy wild sheep herd near Provo peak and American Fork Canyon has almost totally been destroyed by mixing with domestics.	Animal Disease Mgmt	The Forest Service agrees that there is a risk of pathogen transfer from domestic sheep to bighorn sheep should the two species come in contact with one another.
Rick Ellison	1	3	I have and will continue to spend a good deal of time in recreation in the North Slope region and domestic sheep seem totally out of place. I would certainly rather see wild sheep than domestics.	Position, No Rationale	
Kevin Noorda	2	1	To whom it may concern. I understand that the Domestic grazing for sheep in the Uinta mountains up for review. I often visit the wilderness area and think that its a wonderful idea to extinguish domestic sheep grazing. I would like to see more Big Horn sheep in the area and other wildlife animals! keep the wilderness just that wild!	Position, No Rationale	
Brandon Thompson	3	1	As we approached the headwaters that led into the lake, we noticed a few dead sheep. We continued walking around in the area, noticed more dead sheep. All in all we encountered more then a dozen dead sheep, layed out undisturbed in the lake and in the upper headwaters.	Wildlife Mgmt	This comment was followed-up on. The location was outside of the project area and the allotments being analyzed. Sheep had fed on poisonous plants causing the mortality. Livestock had been dealt with later in the season.
Brandon Thompson	3	2	Pretty disturbed at this point we decided to head back to camp, Debating weather or not we should use the water from the area or not. Anyways, it was a long hike in and very disappointing to have that scenario unfold in such a majestic place.	Rec. in Wilderness, Roadless, etc.	This comment was followed-up on. The location was outside of the project area and the allotments being analyzed. Sheep had fed on poisonous plants causing the mortality. Livestock had been dealt with later in the season.

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Brandon Thompson	3	3	There are few pristine places left, it's hard to see situations like that unfold.	Position, No Rationale	This comment was followed-up on. The location was outside of the project area and the allotments being analyzed. Sheep had fed on poisonous plants causing the mortality. Livestock had been dealt with later in the season.
Greg Dyson	4	1	I saw the Notice of Intent to prepare an EIS for the High Uintas Wilderness Domestic Sheep Analysis and would like to be added to the interested party contact list for this project. If you have any present or past scoping notices that would help inform comments, please send them my way.	Requests for Information	Mr. Dyson has been added to the mailing list for the project
Greg Dyson	5	1	Thanks for the quick reply, Paul!	No Further Response Required	
Terry Meyers	6	1	Please add me to the interested parties contact list for the High Uintas Wilderness Domestic Sheep Analysis EIS.	Requests for Information	This has been taken care of. The individual was added to the mailing list.
Jordan Roberts	7	1	I would like to see grazing removed to protect the expanding bighorn sheep population in the area.	Position, No Rationale	
Jordan Roberts	7	2	It is well known that domestic sheep can give wild sheep diseases that can wipe out an entire herd.	Animal Disease Mgmt	Respiratory disease is not necessarily transferred from domestic sheep to bighorn sheep, but rather its pathogens that can be transferred that can cause respiratory disease in bighorn sheep.
Jordan Roberts	7	3	Due to the low numbers of wild bighorns, and the herd in the area doing well, as well as the millions of dollars spent in the effort to rehabilitate sheep populations and the economic value they have to our state I would like to see the grazing terminated to protect the wild bighorns.	Proposed Action, Decision and Wildlife Mgmt	Thanks for your comment. It should be acknowledged the Uintas bighorn sheep were introduced into the Uintas in 1983 and although there is a risk of bighorn sheep contact with domestic sheep allotments, the two species have been coexisting with domestic sheep grazing for several decades.

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Jean Public	8	7	I oppose allowing any sheep profiteer from using this national land, that belongs to 325 million people. these sheep profiteer leaches have been destroying these national lands for years, bringing sheep scrapie to destroy and contaminate and disease wildlife for far too long. they also bring in Mexicans to tend their flocks, which said people require welfare of millions of dollars that general taxpayers pay for. we don't need them either. we want our wild lands back. we want wildlife back in peace. these shep profiteers have been leaches paying very very low amounts to the forest service, none of which ever gets even one penny to the national treasury. if the sheep profiteers want to graze their sheep, let them go to private lands and pay the going rates that they should be payhing. the sheep graers have been leaching off national taxpayers for too long already. we want wildlife and birds to have peace on these national lands. the forest service has never protected nature, but it is certainly well past time to do so. these leases are abusive to all nature. I am in favor of this site being designated national wilderness now. these sheep profiteers also call in aphis wildlife services who sneak into an area and murder millions of animals just because they get one sneaky call from a sheep rancher. nature has no chance at living in this site because of these sheep ranchers and their evil doings. get the sheep off all l0 allotments. they are leaching destructive force on national land. I see no reason that this land which belongs to 325 million people is used by these locals who leach on the rest of us. this comment is for the public record. please receipt. jean publiee jeanpublic1@yahoo.com	Position, No Rationale	
Philip Jiricko	9	1	Paul, I wanted to express concern over the Fed Reg EIS and the very short time frame for comment period of 30 days. Giving the community 30 days, especially during this time of year, almost gives the impression that the FS is trying to limit the number of potential comments. Having met with you, this does not make any sense to me. I am certain you would want ample representation of constituents comments. Would you consider extending the comment period to 60 days?	Comment Period Extension	The regulations in preparing an EIS require that we post a notice in the federal register. This notice is to notify the public that an EIS is going to be prepared on the project. We then start the EIS process that has a required scoping period. The EIS project scoping notice, where we'll be sending out a formal letter from our office, will occur late January or early February for the project. Now is the time to prepare your comments and then when the public scoping notice is sent out comments can be sent in. There will be a 30 day

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					comment period when we send out the project scoping notice. Comments received during the NOI and the EIS scoping periods, and those received during the earlier comment period (June 2014) will be reviewed and analyzed as part of the EIS. We certainly want to provide the public the opportunity to comment on projects on Forest Service managed lands. It is probably a bit confusing as you see a NOI comment period along with project scoping periods. We do not plan on extending the NOI comment period given that the project scoping period will be occurring through most of February.
Allison Jones	10	1	See the attachment for the letter.	Comment Period Extension	The regulations in preparing an EIS require that we post a notice in the federal register. This notice is to notify the public that an EIS is going to be prepared on the project. We then start the EIS process that has a required scoping period. The EIS project scoping notice, where we'll be sending out a formal letter from our office, will occur late January or early February for the project. Now is the time to prepare your comments and then when the public scoping notice is sent out comments can be sent in. There will be a 30 day comment period when we send out the project scoping notice. Comments received during the NOI and the EIS scoping periods, and those received during the earlier comment period (June 2014) will be reviewed and analyzed as part of the EIS. We certainly want to provide the public the opportunity to comment on projects on Forest Service managed lands. It is probably a bit confusing as you see a NOI comment period along with project scoping periods. We do not plan on extending the NOI comment period given that the project scoping period will be occurring through most of February.
Jonathan Ratner	11	1	Oh, I am not at all done. Just started to send the initial material. Within a day or two I should have the rest of the comments done and off	No Further Response Required	

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Michelle MacDonald	12	1	As this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it Is important you continue to Inform us of proposed actions and decisions, including appeals and objections, and continue to provide us the opportunity to express pertinent issues and concerns.	Requests for Information	The State of Wyoming is a cooperating agency and has been participating in development of alternatives and assisting in the analysis. The Wyoming Department of Agriculture and the Wyoming Fish and Game Commission has been assisting the State in their cooperating agency responsibilities.
Michelle MacDonald	12	2	As a result, this decision will directly impact Wyoming producers, thus WDA formally requests to serve as a Cooperating Agency for all future planning meetings, as well as development of draft alternatives pertaining to these allotments.	Government entities and Issues, Alternatives	The State of Wyoming is a cooperating agency and has been participating in development of alternatives and assisting in the analysis. The Wyoming Department of Agriculture and the Wyoming Fish and Game Commission has been assisting the State in their cooperating agency responsibilities.
Michelle MacDonald	12	3	There are numerous forests within Region 4 implementing a Risk Assessment Model (Model) for bighorn and domestic sheep. WDA has not seen the results of the Model for the propo·sed project area, but would request this information to help us better understand the possible conflict between bighorn and domestic sheep. In addition to the results of the Model, we believe it's Important to emphasize the Model is a reflection of a bighorn sheep making contact with an allotment. The Model does not in any way indicate risk of contact with domestic sheep nor does it reflect risk of disease transmission.	Animal Disease Mgmt	
Michelle MacDonald	12	4	We also ask the Forest to provide all the scientific data collected prior to developing a range of alternatives or making any decisions impacting domestic sheep grazing. This data should include baseline data for bighorn sheep, Canada Lynx, grey wolf, or other sensitive species. We believe it is inappropriate to make any management decisions or changes, including additional terms and conditions on domestic sheep permits without comprehensive data.	Requests for Information	The DEIS, BE, and BA review the data that has been collected for bighorn sheep, Canada lynx, gray wolf and other sensitive species. The BE concluded the only sensitive species with habitat in the allotments are bighorn sheep, northern goshawk, and the great gray owl. The BE reviews and analyzes the data for these species. The BE also concludes that the Uintas is outside the range of the great gray owl and any occurrences in the Uintas, which are few, are considered accidental occurrences. The BE also concluded, and the US Fish and Wildlife Service agrees (IPAC) that the gray wolf does not occur in the Uintas. The BA reviewed surveys for Canada lynx and its prey species, which data has found no evidence of Canada Lynx on either Forest. The BA

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					also reviewed the Northern Rockies Lynx Management Direction, which concludes that the Uintas is unoccupied lynx habitat. The BA also reviewed the US Fish and Wildlife Service Lynx Conservations Assessment and Strategy, which concludes that the Uintas is periphery lynx habitat that is unlikely to support a female lynx. The US Fish and Wildlife Service concurred with the findings in the BA.
Michelle MacDonald	12	5	Should the Forest use research to support their recommendations, we insist the research is peer reviewed. We strongly oppose using "white papers" in lieu of peer reviewed science. · This is also true when analyzing the Impacts of domestic sheep grazing on designated wilderness areas. WDA asks the Forest to provide historical background information for domestic livestock grazing in these allotments as it predates the designation of the Wilderness Act of 1964 as well as the designation of the High Ulntas Wilderness Area by act of Congress In 1984. Specifically WDA requests the Forest ensure upland and riparian vegetation trend data is included to make scientific based decisions regarding the allotments meeting Desired Conditions and compatibility of domestic livestock grazing In designated wilderness areas.	Domestic Livestock, Grazing Mgmt; Vegetation Mgmt	The Ashley and the Uinta-Wasatch-Cache National Forests use "best available science" to determine condition and trend when analyzing impacts of sheep grazing on rangelands. Best available science includes both relevant published literature and quantitative and qualitative information derived from site specific monitoring. Site specific information collected from long-term studies is used to determine whether or not desired conditions are being met and to determine the direction of trend. Monitoring methods used by the Forests are selected based on efficiency, economy, and relevant output information that directly addresses desired condition criteria. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Each of these methods have been peer reviewed, are included in the Forest Service Handbook 2209.14 Chapter 20, and/or are supported in literature. The Ashley National Forest has produced "white papers" and powerpoint presentations to standardize the processes of these monitoring methods to improve efficiency, insure consistency, and train personnel. These do not deviate from the intent of the monitoring methods but emphasize and clarify their processes. Several key rangeland characteristics are monitored at many of the study sites to determine condition and indicate trend for vegetation. These may

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					include ground cover, species presence and cover and/or frequency, crown cover, density, and vegetation height. The response of herbaceous and woody plant species following disturbance (i.e. grazing) is also assessed at affected sites. These characteristics are applicable to the management and desired condition standards and mitigation measures for vegetation outlined in the proposed action of the analysis, which are listed below: Total ground cover equal to or greater than 85% of potential for all plant communities grazed by livestock. Plant communities dominated by native and selected non-native plant species of moderate to high value for watershed protection (or erosion control) are equal to or greater than 60% of relative cover in plant communities. Selected non-native species are those included in s eedings of roadsides, burned areas, and rangelands that have high value for soil protection. These species have generally demonstrated capacity to suppress cheatgrass and other invasive annuals. Dominance includes greater cover, greater frequency, or greater abundance of moderate and high value plants than low value plants. This includes woody species as well as herbaceous species Forage utilization in alpine areas within and outside the High Uintas Wilderness Area will not exceed 40% (Wilderness Management Plan). In goshawk habitat (forested lands, including transitory openings created by fire), limit understory grazing utilization to an average of 20% by weight, not to exceed 40% on any specific site. Average browse utilization would be limited to 40% by weight, and would not exceed 60%. This standard does not apply to non-forested habitat types (Goshawk Strategy). Leave a 4" or greater stubble height of herbaceous species at the end of the grazing season between greenline and bank full of stream systems. Desired condition standards used by the Forest are also supported in the literature and are recognized and accepted by Forest

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					Service handbooks. The Ashley National Forest has also produced "white papers" and powerpoint presentations that focus on desired condition and adaptive management strategies. The Ashley National Forest has histories prepared for the allotments under analysis, which include stocking rates and season of use predating the Wilderness Act of 1964 and High Uintas Wilderness Act of 1984. Furthermore, many long-term studies from these allotments predate wilderness and have been used in the analysis to determine condition and trend of forest resources. The vegetation report(s) from this project concludes that "the numerous studies in the project area indicate desired condition or trend toward this condition is concurrent with direct, indirect, and cumulative effects."
Michelle MacDonald	12	6	WDA does not support the Identified No Action Alternative.	Position, No Rationale	
Michelle MacDonald	12	7	WDA insists the Forest defines "viability." WDA Is concerned the term viability for sensitive plants and animals Is ambiguous and Interpreted differently between forest service staff, ranger districts, and regional forest offices. It is inappropriate for the Forest to require viability at the allotment scale.	Wildlife Mgmt	For Forest Planning the term viability is applied at the Forest Scale. For biological discussions the term viability can be applied to interconnected herds. The analysis uses these two definitions depending upon the context as well as a third definition by the State of Utah, which uses a state-wide scale. These definitions are discussed in the DEIS pages 139 and 141. For reference, the Planning Rule definition is below. The 1982 Rule states the following: For planning purposes, a viable population shall be regarded as one which has the estimated numbers and distribution of reproductive individuals to insure its continued existence is well distributed in the planning area. The 2012 Rule (current operating rule) states a viable population is: A population of a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments.

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Michelle MacDonald	12	8	Also, the Forest must recognize the States of Utah and Wyoming, not the Forest Service or the US Fish and Wildlife Service have jurisdictional authority over state managed species. The Forest Is tasked with managing habitat, not populations.	Roles, Authorities	The Forests recognizes the roles the states play in managing wildlife species according to laws and jurisdictions. The Forests have the responsibility to manage habitat to maintain ecological conditions that provide for sustainable wildlife populations (2012 planning Rule, 36 CFR 219.9(b)(1)).
Michelle MacDonald	12	9	The Forest must analyze cumulative impacts beyond an individual permittee or allotment, but rather the domestic sheep industry as a whole. Removing domestic sheep from these allotments will not only cause significant economic Impacts to the Individual permittees, but also the communities in which they reside, as well as other domestic sheep producers across the West. The Payette National Forest Bighorn Sheep Viability Analysis and Forest Plan Amendment are prime examples of how a decision In one forest significantly affects other western forests.	Cumulative Effects Analysis	The Forest Service is required to analyze and assess cumulative impacts. Per Forest Service Handbook 1909.15, Chapter 10, Section 15.1, cumulative effects are the "Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions may have collective or cumulative impacts that are significant. Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources. "The Council of Environmental Quality in a June, 2005 Memorandum on cumulative effects stated the following: "The analysis of cumulative effects begins with consideration of the direct and indirect effects on the environment that are expected or likely to result from the alternative proposals for agency action. Agencies then look for present effects of past actions that are, in the judgment of the agency, relevant and useful because they have a significant cause-and-effect relationship with the direct and indirect effects of the proposal for agency action and its alternatives. CEQ regulations do not require the consideration of the individual effects of all past actions to determine the present effects of past actions. Once the agency has identified those present effects of past actions that warrant consideration, the agency assesses the extent

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					that the effects of the proposal for agency action or its alternatives will add to, modify, or mitigate those effects. The final analysis documents an agency assessment of the cumulative effects of the actions considered (including past, present, and reasonable foreseeable future actions) on the affected environment." With respect to evaluating the impacts to the sheep industry as a whole, the bounds of analysis (both spatially and temporally) established for the effects analysis are determined according to how far out effects can be discernibly measured. Bounds of analysis are resource specific, and the bounds of analysis will be determined in the socioeconomic specialist report for this project and will be based upon the ability to meaningfully measure effects to not only individual permitees and local communities, but the sheep industry if indeed the results of this project are determined to be measurable at that level. In regards to the Payette National Forest's decision, while having some similarities with this project, both the Ashley and Uinta-Wasatch-Cache National Forests share different circumstances, different resources and different issues than the Payette National Forest. The outcome of this project is not predetermined to mirror the outcome of the Payette National Forest, and as such, the impacts are likely to be different.

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Michelle MacDonald	12	10	We strongly support working closely with the grazing permittees and Cooperating Agencies to develop a Preferred Alternative. WDA reminds the Forest to utilize a broad range of management options, such as herding, guard dogs, topography, and season of use when developing the range of alternatives. We also urge the Forest to have and include comprehensive data and planning in place for the trailing of domestic sheep to these allotments. Trailing is a permitted use of forest lands. We caution the Forest from proceeding without adequate data and planning regarding trailing in the NEPA document.	Alternatives (comparing, range)	The Forests will be considering a range of alternatives that will utilize a broad range of management options. Sheep trailing across the Uinta-Wasatch-Cache National Forest to access the Gilbert Peak, Hessie Lake-Henry's Fork, Red Castle, East Fork-Blacks Fork, Ottoson, Oweep, Painter Basin, and Tungsten Allotments is considered a connected action to the project analysis. Condition and trend of the sheep driveway is based on approximately 71 long-term studies permanently established on or adjacent to the driveway. In the Revised Forest Plan on page 4-201, desired future condition for rangeland and livestock states that "The East Fork driveway will be managed as a driveway for as long as it is needed. Permittees take responsibility for the following driveway management plan and minimizing impacts (Wasatch-Cache National Forest 2003). The Forest Plan directs that the sheep driveway is to be managed as a driveway. Forest direction for use of the sheep driveway by permittees is found in The East Fork Blacks Fork Sheep Driveway Management Plan and in the Annual Operating Instructions.
Michelle MacDonald	12	11	We insist the Forest proactively consider all options, Incorporating vacant allotments, forage reserves, closed allotments, and conversions as part of the Proposed Alternative. Consideration of these In Domestic Sheep Allotments Ulnta-Wastach-Cache the Proposed Alternative will ensure NEPA is comprehensive	Alternatives (comparing, range)	In response to public comment and internal resource staff input a number of alternatives will be considered for this analysis. These will include relocation of livestock to other allotments and conversion from sheep to cattle. Those alternatives that meet the purpose and need of the project, are able to be implemented and are consistent with direction within the Forest Plans will be carried through the analysis.
Jonathan Ratner	13	1	High Uintas Sheep EIS DEADLINE DEC 31 - Part 1	No Further Response Required	Attachments for Review

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Adam Bronson	14	1	It is well documented in scientific literature the threats domestic sheep and goats pose to bighorn sheep by exposing them to pathogens that lead do deadly pneumonia and other diseases.	Animal Disease Mgmt	The Forest Service agrees that there is a risk of pathogen transfer from domestic sheep to bighorn sheep should the two species come in contact with one another. This issue is evaluated and analyzed in the Assessment of the North Slope Uintas Bighorn Sheep Herds, the DEIS and the BE.
Adam Bronson	14	2	I urge the Forest Service to form working groups with sheep producers, sportsmen, state wildlife agencies, and other interested parties to try and find other solutions to avoid or dramatically minimize this threat to the existing bighorn herds in the Rock Creek/ Flaming Gorge. High Uintas areas.	Alternatives (comparing, range) and Public Involvement	The Forest Service is working with the states of Wyoming and Utah and other cooperating agencies to develop alternatives to address issues that have been identified, including the risk of disease spread from domestic sheep to bighorn sheep. Given the proximity of the other domestic sheep allotments on both Forest Service and Bureau of Land Management lands and the private lands, the input from both the states of Wyoming and Utah, the understanding that the bacteria that is associated with pneumonia is found in a wide variety of other wild animals and the lack of alternative range lands, we believe the two alternatives present are the only viable alternatives.
Adam Bronson	14	3	I urge the U.S. Forest Service to consider more alternatives that will minimize the risk of contact between domestic and bighorn sheep in these allotments.	Alternatives (comparing, range)	See the DEIS for alternatives considered and analyzed. Alternatives considered include: no action, continue grazing as is, reduce the number and/or size of allotments, increase domestic sheep stocking and expanded season of use, expand the analysis area to include the West Fork Blacks Fork Allotment, allotment conversion from sheep to cattle, and relocation of livestock to other Forest Service allotments.
Adam Bronson	14	4	Please keep me on the mailing list for updates on this issue.	Requests for Information	This individual has been placed on the mailing list.
Anon Zach	16	1	If scientific evidence (1) & (2)* suggests there would be a major negative impact on bighorn populations, then why even do the study? If we already have evidence that suggests such, it seems like an unwise use of resources as well. In addition to the negative impact to the bighorn population, what impact will this have on other animals in the High Uintas (goats, elk, deer, etc.)?	Wildlife/Animals Mgmt	There are other resources that domestic sheep grazing may effect besides bighorn sheep, and the Forest Service is required by NFMA to analyze impacts to those resources (including designated sensitive species like bighorn sheep) from proposed management actions such as domestic sheep grazing. The Forest Service is

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			There is evidence that it will also have a negative effect (3)*.		also required to consider the best available science, which includes opposing literature. The analysis found that there could be some impacts to elk and deer such as forage competition and/or displacement. However, the Analysis found that forage and vegetation are in satisfactory condition in the allotments and providing forage for these elk and deer concurrent with grazing. Therefore, forage competition is not an issue for elk and deer and displacement is therefore unlikely. Refer to the DEIS pages 174-180 and Wildlife Specialist Report pages 11-17. Mountain Goats are not a special status species and therefore were not specifically analyzed. However, because they are a similar species (ungulate like elk, deer, and domestic sheep) the impacts to mountain goats from domestic sheep would likely be the same as described in the analysis for elk and deer.
Jonathan Ratner	17	1	I am very confused now. I am hearing this is only an 'initial' scoping and there will be a second 'detailed' scoping in the spring. Could you let me know what the case is?	Requests for Information	What was published in the Federal Register is the Notice of Intent to complete an Environmental Impact Statement on the project. When we prepare to complete an Environmental Impact Statement this is a required step. Initially we were going to do an environmental assessment on the project but are now shifting this to an EIS so we are completing this step of the process. We will be sending out a scoping letter on the project, now that it will be an EIS. We anticipate that this will occur in late January or early February. There will a request for comment associated with scoping mailing. All comments received including those from the initial scoping (June 2014, the NOI notice and the upcoming scoping period) will be considered.

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Kevin Mueller	18	1	"Comments concerning the scope of the analysis must be received by December 31, 2015." On the next page the NOI continues, "Scoping for this project was initiated in May of 2014." … "This notice of intent initiates the scoping process which guides the development of the environmental impact statement. Following this Notice of Intent, it is anticipated that a second scoping letter describing the nature of the project will be sent to interested parties and organizations in the fall of 2015. … Additionally, public meetings are being considered as well, and would occur after a scoping letter was sent out." (Emphasis added.) That scoping solicitation letter has not been sent out. There appears to be a conflict among dates.	Laws, Policies	You are correct and there was an error in the NOI notice. The NOI notice which was published on December 1, 2015, stated that a second scoping letter was to be sent out in the fall of 2015. The second scoping notice was sent out on February 16, 2016. Thank you for pointing out this error.
Kevin Mueller	18	2	Since this is to be analyzed in an EIS and is a complex issue with much analysis needed, we urge you to provide a minimum 60 day comment period.	Comment Period Extension	The regulations in preparing an EIS require that we post a notice in the federal register. This notice is to notify the public that an EIS is going to be prepared on the project. We then start the EIS process that has a required scoping period. The EIS project scoping notice, where we'll be sending out a formal letter from our office, will occur late January or early February for the project. Now is the time to prepare your comments and then when the public scoping notice is sent out comments can be sent in. There will be a 30 day comment period when we send out the project scoping notice. Comments received during the NOI and the EIS scoping periods, and those received during the earlier comment period (June 2014) will be reviewed and analyzed as part of the EIS. We certainly want to provide the public the opportunity to comment on projects on Forest Service managed lands. It is probably a bit confusing as you see a NOI comment period along with project coping periods. We do not plan on extending the NOI comment period given that the project scoping period will be occurring through most of February.

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Kevin Mueller	18	3	We wish to (re)emphasize that negative impacts, and conflicts among alternative uses, relating to the following items must not just be within the scope of the EIS, but treated as significant and/or key alternative-driving in nature:	Issues, Alternatives	The effects analysis for the EIS will include a thorough discussion and review of a variety of resource topics as they relate and are affected by the various alternatives that will be selected for in depth analysis. Effects can be beneficial and negative, both of which will evaluated by resource. A significant impact or effect is defined in NEPA both in terms of context and intensity. 40 CFR § 1508.27 defines the term significantly as the following: "(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant. (b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity: (1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial. (2) The degree to which the proposed action affects public health or safety. (3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. (4) The degree to which the effects on the quality of the human environment are likely to be highly controversial. (5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks. (6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future

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					consideration. (7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts. (8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. (9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. (10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment." The Forest Service is required per 40 CFR § 1501.2 (c) to: " Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act." The Forest Service Handbook 1909.15, Chapter 10, Section 14 further states that " No specific number of alternatives is required or prescribed. " and " Reasonable alternatives to the proposed action should fulfill the purpose and need and address unresolved conflicts related to the proposed action. " That being said, if there are resources that are identified to be impacted significantly during the course of the analysis, alternatives can be developed to address those unresolved conflicts, and if effects are determined to be significant or adverse based upon the definition in 40 CFR § 1508.27, than the agency is required in an EIS to mitigate and reduce the impacts through a variety of methods including design criteria, best management

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					practices, etc. 40 CFR § 1502.14 states that " agencies shall (f) Include appropriate mitigation measures not already included in the proposed action or alternatives. " Additionally, 40 CFR § 1502.16 (h) further goes on to state that the environmental consequences section of the EIS shall include discussions of " Means to mitigate adverse environmental impacts (if not fully covered under §1502.14(f)). "
Kevin Mueller	18	4	Rocky Mountain bighorn sheep	Wildlife Mgmt	Rocky Mountain bighorn sheep have been identified as an issue both from the previous scoping effort in May of 2014 and from this Notice of Intent. As such, bighorn sheep will be an integral part of the analysis contained within the Environmental Impact Statement.
Kevin Mueller	18	5	Wilderness	Rec. in Wilderness, Roadless, etc.	During the scoping process for the original scoping letter in May, 2014, wilderness values and impacts to wilderness were identified as an issue. As such, during the process of preparing the Environmental Impact Statement, impacts to wilderness will be fully assessed.
Kevin Mueller	18	6	Other Threatened/Endangered/Proposed/Candidate and U.S.F.S. Sensitive plant and animals, as well as their habitats	Wildlife/Animals Mgmt	Threatened, Endangered, and Proposed species were evaluated in the BA and sensitive species were evaluated in the BE. Effects to these species from domestic sheep did not warrant the consideration of a 3rd alternative, except for bighorn sheep. The DEIS discusses the consideration of a third alternative to address concerns for bighorn sheep.
Kevin Mueller	18	7	Soils	Soils Mgmt	As a part of the environmental effects analysis for the EIS, impacts to soils from the various alternatives will be analyzed and fully assessed.

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Kevin Mueller	18	8	Bare ground from sheep grazing as well as bedding and trailing practices between watersheds	Soils Mgmt	Sheep grazing, trailing, and sheep bedding will be evaluated and analyzed as a course of the environmental analysis.
Kevin Mueller	18	9	Hydrology,	Water, Watershed Mgmt	As a part of the effects analysis for the Environmental Impact Statement, the effects of the various alternatives and their impacts to hydrology will be assessed and fully analyzed.
Kevin Mueller	18	10	Area as water storage sources for downstream water users and how activities such as grazing of domestic sheep and cattle in these sensitive watersheds affect water storage, flood forces and stream habitats (bank scouring),	Water, Watershed Mgmt	The hydrology section of the EIS will include information on the current conditions and effects of grazing to downstream water users, municipalities, the condition of flood plains, and stream habitats including bank scouring. Field reviews of the allotments did not identify concerns with grazing effects on water storage, downstream water users, conditions of floodplains, or bank scour except where bank trampling occurs which will be analyzed in the EIS and these impacts do not appear to be significant such that it would lead to the development of alternatives. Conditions of substrate for spawning cutthroat trout will not be analyzed as an independent variable but conditions of fisheries habitat will be analyzed.
Kevin Mueller	18	11	cover and substrate for spawning cutthroat trout.	Wildlife Mgmt	We agree that livestock grazing may impact fish and their habitat. We have collected fish population and habitat data throughout the project area, and will be analyzing potential impacts to fish and fish habitat from each alternative.
Kevin Mueller	18	12	Native plant biodiversity compared to long-term livestock exclosures/ungrazed watersheds in the Uinta	Vegetation Mgmt	Native plant biodiversity of vegetation communities within the project area is addressed in terms of species richness. The primary sampling method used to determine species richness at a given site is the ocular macroplot method, which is commonly used by both the Ashley and Uinta-Wasatch-Cache National Forests (USDA 2008). A species list is generated by identifying and listing every plant species observed within a 1/10 th acre circular plot. Percent absolute cover of each plant species is also estimated, which indicates its

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					importance, dominance, or commonality within the community. Numerous studies within the project area and across the Uinta Mountain range have ocular macroplot data, including areas and watersheds that do not permit domestic livestock grazing. Much of this information is summarized from long-term studies within and without the project area and from the publication "An Alpine Plant Community Classification for the Uinta Mountains, Utah" (Brown 2006). Several plant communities commonly grazed by domestic sheep were selected from both the Ashley and the Uinta-Wasatch-Cache National Forests to compare species richness with and without domestic livestock grazing. Twelve sites of plane-leaf willow/single-spike sedge (Salix planifolia/Carex scirpoidea) were selected, 5 sites grazed and 7 sites non-grazed, for analysis. Plane-leaf willow communities typically have moist soils but are not water-saturated. For the grazed sites, species richness averaged 18 plants with a range of 13 to 22 plant species. At non-grazed sites, species richness averaged 16.3 plants with a range of 9 to 22 plant species. Another plant community type with moist to ephemerally moist soils is tufted hairgrass (Deschampsia caespitosa) dominated sub-alpine and alpine meadows. Twenty sites, 17 sites grazed and 3 sites non-grazed, were analyzed. For the grazed sites, species richness averaged 16.3 plants with a range of 7 to 30 plant species. At non-grazed sites, species richness averaged 17.6 plants with a range of 13 to 22 plant species. Timber oatgrass (Danthonia intermedia) dominated sub-alpine and alpine meadows exist where soils are relatively developed but are drier than the communities described above. Twenty sites, 15 sites grazed and 5 sites non-grazed, were analyzed. For the grazed sites, species richness averaged 16.5 plants with a range of 10 to 23 plant species. At non-grazed sites, species richness averaged 16.6 plants with a range of 12

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					to 21 plant species. Kobresia myosuroides forms a dense alpine turf in dry, typically rocky soils in areas that are slightly wind-swept. Ten sites, 6 sites grazed and 4 sites non-grazed, were analyzed. For the grazed sites, species richness averaged 19.8 plants with a range of 13 to 25 plant species. At non-grazed sites, species richness averaged 19.5 plants with a range of 16 to 29 plant species. All plants observed and identified in the plant communities above are native to the Uinta Mountains. Differences in the averages and ranges for species richness of the four plant communities analyzed appear within the range of natural variability for the communities. Furthermore, the vegetation report(s) for this project concluded that "the plant communities grazed by livestock are in satisfactory condition with stable trends or are trending toward desired condition. Vegetation desired condition is defined by two key characteristics relating to ground cover and plant species composition. Native plant biodiversity is being sustained under current grazing management. Lierature Cited Brown, Garry D. 2006. An alpine plant community classification for the Uinta Mountains, Utah. United States Department of Agriculture, Forest Service, Intermountain Region, Ashley and Wasatch-Cache National Forests, Ogden, Utah. 140 pgs. United States department of Agriculture. 2008. Ocular macroplot field guide. United States Department of Agriculture, Forest Service, Range Management Staff, Washington Office, Washington, D. C. 21 pgs.
Kevin Mueller	18	13	Dominance of sites by a few increasers, native or exotic plants	Vegetation Mgmt	Vegetative condition for the allotments are based on approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Uinta-Wasatch-Cache National Forest permanently established within the project area (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies, Gilbert Peak = 49 studies, Hessie Lake-Henrys Fork = 48,

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					Red Castle = 76 studies, East Fork-Blacks Fork = 115 studies, Middle Fork-Blacks Fork = 55 studies). Trend and condition were determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-Step. Several key rangeland characteristics were monitored at many of the study sites to determine condition and indicate trend for vegetation. These may include ground cover, species presence and cover and/or frequency, crown cover, density, and vegetation height. The response of herbaceous and woody plant species following disturbance (i.e. grazing) was also assessed at affected sites. The analysis determined that were increases in some woody vegetation, namely low willows and conifers. The following studies from the Ashley National Forest show increase or stability of willow over the past few decades: 10-1, 11-2A, 11-2B, 11-2C1, 11-2D, 11-2E2, 11-2F1-F3, 11-2G1-G2, 11-2H, 11-3B, 12-2A-B, 12-6A, 12-7A-B, 12-8, 12-15A-B, 12-15F, 12-22, 12-25A, 12-26A, 12-30A, 12-31A, 12-31C-D, 12-31G, 22-17A, 23-3B-C, 23-4A-B, 23-4D, 23-17A, 24-11K, and 24-13C. The following studies from the Ashley National Forest show increase in of conifer within established willow fields over the past few decades: 11-2A, 11-2B, 11-2C1, 11-2D, 11-2E3, 11-2G1, 11-2H, 12-6A, 12-7A-B, 12-15B, 12-22, 12-46A, 12-46C, 22-7, 22-7C, 22-7I, 22-7P, 23-3A-A2, 23-17D-D2, 23-17E, 23-20J, 24-4A-C, 24-11F1, 24-15A-B. Increases in woody material has been documented at a few sites starting

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					from the late 1940s and 1950s.
Kevin Mueller	18	14	Native pollinators compared to long-term livestock exclosures/ungrazed watersheds in the Uinta	Wildlife Mgmt	Vegetative studies on the allotments have found vegetation communities in general, including those veg communities used by pollinators, to be meeting desired conditions in plant composition, structure, and ground cover. The same conclusion has been found for vegetation communities outside the allotments. Thus, the vegetation community base, on and off the allotments, is available for pollinators. Refer to the Range Specialist Report and description of the vegetation conditions in the DEIS.
Kevin Mueller	18	15	Global warming science re: cumulative effects on high elevation native vegetation conditions, bighorn sheep, and other high elevation wildlife of higher temperatures, earlier snowmelt, reduced snowpack	Wildlife Mgmt	Global warming is not considered an issue that it would lead to the development of alternatives. This is based on the Assessment Watershed Vulnerability to Climate Change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah General Technical Report RMRS-GTR-362 (Rice Et Al. 2017), that includes the High Uintas Domestic Sheep (HUDS) allotments. The section called Intrinsic Adaptive Capacity on page 55 of the assessment, states that factors that raise the adaptive capacity of the Uinta Mountains are " The inherent ability of watersheds to accommodate or cope with climate change impacts is good for most of Uinta Mountain watersheds because they have good forest cover, aquatic habitats, and riparian and wetland conditions. Bark beetles have reduced forest cover by causing mortality of lodgepole pine in the northwestern slope. Fire effects are moderate for almost all of the watersheds." Factors that lower the adaptive capacity are watersheds that have poor forest cover, aquatic habitats, and riparian and wetland conditions. The Uinta Mountain watersheds that the HUDS allotments are located have good watershed conditions that give them the ability to accommodate or cope with climate change

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					impacts. In the assessment of the North Slope Uinta's Bighorn Sheep Herds (USDA FS 2019), climate change is discussed on how it may impact bighorn sheep in the Uinta's, and it was determined that climate change has a low risk to the Uinta's bighorn sheep. USDA FS. 2019. Assessment of the North Slope Uintas Bighorn Sheep Herds. Ashley and Uinta-Wasatch-Cache National Forests.
Kevin Mueller	18	16	Cumulative impacts on high elevation native vegetation conditions of global warming, increased elk, domestic sheep, Mountain Goats	Cumulative Effects Analysis	As a course of conducting the environmental analysis, the resource specialists assigned to this project will evaluate the impacts to a variety of resources including wildlife, and vegetation. In regards to cumulative effects - The Forest Service is required to analyze and assess cumulative impacts. Per Forest Service Handbook 1909.15, Chapter 10, Section 15.1, cumulative effects are the "Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions may have collective or cumulative impacts that are significant. Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources. "The Council of Environmental Quality in a June, 2005 Memorandum on cumulative effects stated the following: " The analysis of cumulative effects begins with consideration of the direct and indirect effects on the environment that are expected or likely to result from the alternative proposals for agency action. Agencies then look for present effects of past actions that are, in the judgment of the agency, relevant and useful because they have a significant cause-and-effect relationship with the direct and indirect effects of the

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					proposal for agency action and its alternatives. CEQ regulations do not require the consideration of the individual effects of all past actions to determine the present effects of past actions. Once the agency has identified those present effects of past actions that warrant consideration, the agency assesses the extent that the effects of the proposal for agency action or its alternatives will add to, modify, or mitigate those effects. The final analysis documents an agency assessment of the cumulative effects of the actions considered (including past, present, and reasonable foreseeable future actions) on the affected environment." Resource specialists will determine through a variety of methods which projects (if any) combine with the chosen alternative to create cumulative effects. It is important to keep in mind that in order for an effect to be cumulative with the chosen alternative, the effect from a past, present, or reasonably foreseeable project must overlap in space and time for there to be a cumulative effect.

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Kevin Mueller	18	17	The impact on populations of elk, deer, bighorn sheep, moose from forage competition with domestic sheep and Rocky Mountain Goats. Include not only numbers of individuals equivalent based on forage demand, but displacement from preferred foraging, breeding and rearing areas.	Wildlife Mgmt	The analysis found that there could be some impacts to elk and deer such as forage competition and/or displacement. However, the analysis found that forage and vegetation are in satisfactory condition in the allotments and providing forage for these elk and deer concurrent with grazing. Therefore, forage competition is not an issue for elk and deer and displacement is therefore unlikely. Ashley National Forest In the ANF Plan, the desired condition for wildlife is to maintain vegetative diversity, providing wildlife habitat for a variety of wildlife species. The goal for wildlife is to manage wildlife habitat to maintain or improve diversity and productivity. The Plan further states objectives and lists standards & guidelines (S&G's) under each of these objectives to attain this goal and desired condition. These S&G's were designed to achieve conditions on the Forest that would provide adequate vegetative and wildlife habitat conditions to sustain Threatened (T), Endangered (E), Sensitive (S), Management Indicator Species (MIS), and a variety of wildlife in general that occur on the Forest. Therefore, achieving these desired conditions would maintain wildlife habitat on the Forest for a variety of wildlife, including TES and MIS. These desired conditions would be achieved by following the Forest Plan. Furthermore, achieving these desired conditions in suitable habitat that may be affected by grazing would ensure that wildlife habitat conditions would remain in a satisfactory condition. The Proposed Action would meet the standards and guidelines outlined in the Forest Plan. Wasatch-Cache National Forest The Revised WCNF [1] Plan desired conditions are defined as the Revised WCNF 2003 Forest Plan Standards and Guidelines and as having those desired plant communities. These standards and guidelines were designed to achieve satisfactory conditions on the Forest that would provide adequate vegetative and wildlife habitat conditions to a variety of wildlife in

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					general that occur on the Forest. Satisfactory condition is defined as meeting desired condition. Therefore, achieving these desired conditions would maintain wildlife habitat on the Forest for a variety of wildlife, including focal species. The analysis determined if habitats for wildlife within the allotments are satisfactory (meeting the desired conditions). The Proposed Action complies with the standards and guidelines (as they relate to wildlife) from the ANF Plan and the Revised WCNF Plan. Refer to the DEIS pages 174-180 and Wildlife Specialist Report pages 2, 3, and 11-17. Mountain goats and moose are not a special status species and therefore were not specifically analyzed. However, because they are a similar species (ungulate like elk, deer, and domestic sheep) the impacts to mountain goats from domestic sheep would likely be the same as described in the analysis for elk and deer.
Kevin Mueller	18	18	The West Fork Black's Fork domestic sheep allotment must be included in the analysis due to it being in bighorn sheep habitat, being used for trailing of domestic sheep into/from East Fork Black's Fork, over Red Knob Pass and into the South Slope allotments, and its severely degraded conditions.	Effects Analysis	This is outside the scope of this project analysis. The West Fork-Blacks Fork Allotment is only utilized by the sheep herd permitted there. It is not being used for trailing of sheep into and from East Fork-Blacks Fork. It is not used by any other sheep herds trailing to their respective allotments on the north and south slopes.
Kevin Mueller	18	19	Analysis of trail register comments for trail heads into these 11 allotments as part of the Recreation analysis.	Rec. in Wilderness, Roadless, etc.	Registration by visitors entering the Wilderness is totally voluntary, and those visitors that complete the registration varies from trailhead to trailhead and day to day. The information being asked for is very basic, and space to elaborate is limited. The majority of the comments typically are focused on trail or camping conditions but also on other topics including domestic sheep. The comments have been short and simple and are not suitable for statistical analysis.

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Kevin Mueller	18	20	Analysis of the killing of predator/carnivores by permittees, herders, DWR, Wildlife Services, guard dogs for the 11 allotments and requiring predator-friendly management methods and a means of tracking mortality of these Sensitive, Management Indicator, or T&E Species populations as affected by conflicts with domestic sheep.	Wildlife/Animals Mgmt	This comment is outside the scope of the analysis. Additionally, TES and sensitive species on the Ashley NF and Uinta/Wasatch/Cache NF are not affected by means of predator control. Likewise, guard dogs have no effect to TES and sensitive species on the Ashley and Uinta/Wasatch/Cache NF's other than the possible effect of dissuading bighorns from coming in contact with domestic sheep, which would be a benefit to bighorns.
Kevin Mueller	18	21	Cumulative Impacts of other projects such as the series of timber sales/salvage on the North Slope (Smith's Fork, West Fork, Roughneck and other sales/salvage projects and their associated roads, road densities, noise and incursions into roadless areas) as well as oil and gas developments, and OHV impacts to the integrity of the overall Uinta Mountains and the Regionally Significant Wildlife Corridor of which they are an integral part.	Cumulative Effects Analysis	In regards to cumulative effects - The Forest Service is required to analyze and assess cumulative impacts. Per Forest Service Handbook 1909.15, Chapter 10, Section 15.1, cumulative effects are defined as the "Individual actions when considered alone may not have a significant impact on the quality of the human environment. Groups of actions may have collective or cumulative impacts that are significant. Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources. "The Council of Environmental Quality in a June, 2005 Memorandum on cumulative effects stated the following: "The analysis of cumulative effects begins with consideration of the direct and indirect effects on the environment that are expected or likely to result from the alternative proposals for agency action. Agencies then look for present effects of past actions that are, in the judgment of the agency, relevant and useful because they have a significant cause-and-effect relationship with the direct and indirect effects of the proposal for agency action and its alternatives. CEQ regulations do not require the consideration of the individual effects of all past actions

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					to determine the present effects of past actions. Once the agency has identified those present effects of past actions that warrant consideration, the agency assesses the extent that the effects of the proposal for agency action or its alternatives will add to, modify, or mitigate those effects. The final analysis documents an agency assessment of the cumulative effects of the actions considered (including past, present, and reasonable foreseeable future actions) on the affected environment." Resource specialists will determine through a variety of methods which projects (if any) combine with the chosen alternative to create cumulative effects. It is important to keep in mind that in order for an effect to be cumulative with the chosen alternative, the effect from a past, present, or reasonably foreseeable project must overlap in space and time for there to be a cumulative effect. Per Forest Service Handbook 1509.15, Chapter 10, Section 15.2: "Spatial and temporal boundaries are the two critical elements to consider when deciding which actions to include in a cumulative effects analysis. Spatial and temporal boundaries set the limits for selecting those actions that are most likely to contribute to a cumulative effect. The effects of those actions must overlap in space and time for there to be potential cumulative effects. "With respect to OHV impacts on the project, the vast majority of the project is contained within the wilderness boundaries of the High Uintas, and as such, for that portion contained within the wilderness, there would be no OHV impacts.
Kevin Mueller	18	22	Cumulative Impacts of the trailing of Domestic Sheep on public lands/carnivores/predators (lynx, bear, wolf, coyote, wolverine)	Cumulative Effects Analysis	The impacts of domestic sheep and associated trailing to Canada Lynx and wolverine were evaluated and analyzed. This analysis can be found in the BA. The BE documents that there will be no impacts to the gray wolf largely because this species is not documented to be in the Uinta's. The only species of bears that reside in the Uintas is the black bear. The black bear is not a

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					special status species and therefore was not specifically analyzed in the DEIS, BE, or Specialist Report. As this species is similar to wolverine (in that it is a carnivore, is opportunistic, and is a scavenger) the impacts to black bears from domestic sheep (and associated trailing) are likely similar to what is discussed in the BA for wolverine.
Kevin Mueller	18	23	Areas/routes traveled by Canada lynx based on radio collar data from the Colorado reintroductions in the late 1990's - mid 2000's.	Wildlife Mgmt	Effects from domestic sheep grazing to Canada lynx and their habitat was analyzed in the BA. In 2007 there was a lynx that crossed through the Uintas from Colorado, but only traveled through and did not take up residency. This is the only Colorado lynx that is known to have traveled through the Uintas. Thus, there are no known lynx areas or routes in the Uuintas. Additionally, the Uintas is considered unoccupied lynx habitat by the Northern Rockies Lynx Management Direction and considered peripheral habitat (likely would not support a female lynx, because of lack of quality habitat and forage base) by the US Fish & Wildlife Service 2013 Lynx Conservation and Assessment Strategy.
Kevin Mueller	18	24	All past observations and records of bighorn sheep occurrences	Wildlife Mgmt	The Forest Service acquired Uintas bighorn sheep location data from the Utah Division of Wildlife Resources. This location data includes observation locations, telemetry locations, and satellite locations from the time that UDWR introduced bighorn sheep in the Uintas in 1983 through early 2019. This location data was used in the Risk of Contact (ROC) model to estimate the Uintas bighorn sheep Core Herd Home Range. The ROC model was then used as part of the analysis of domestic sheep use on the 10 allotments.
Jonathan Ratner	19	1	I am very confused now. I am hearing this is only an 'initial' scoping and there will be a second 'detailed' scoping in the spring. Could you let me know what the case is?	Requests for Information	What was published in the Federal Register is the Notice of Intent to complete an Environmental Impact Statement on the project. When we prepare to complete an Environmental Impact Statement this is a required step. Initially we were going to do an environmental assessment on the project but are now shifting this to an EIS so we are completing this step of

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					the process. We will be sending out a scoping letter on the project, now that it will be an EIS. We anticipate that this will occur in late January or early February. There will a request for comment associated with scoping mailing. All comments received including those from the initial scoping (June 2014, the NOI notice and the upcoming scoping period) will be considered.
Jeremy Gleed	20	1	I would encourage the USFS to carefully analyze and take into account the impact that such grazing and interaction has had on wild bighorn sheep in this area.	Effects Analysis	The bighorn sheep herds that occur in the Uinta's are introduced (by the Utah Division of Wildlife Resources) herds with the initial introduction in 1983. These herds have been manipulated by the Utah Division of Wildlife Resources since that time through more introductions of herds, augmentations, removing, culling, and hunting. The Forest Service analyzed impacts of domestic sheep to the Uinta's bighorn sheep. This analysis can be found in the Assessment of the North Slope Bighorn Sheep Herds pages 12-37, DEIS pages 139-168, and BE pages 18-36.
Jeremy Gleed	20	2	It is my understanding that this has been negative, with statistically and ecologically significant dwindling wild bighorn sheep numbers (R4 bighorn sheep risk assessment).	Wildlife Mgmt	The Forest Service agrees that there is a risk of pathogen transfer from domestic sheep to bighorn sheep, should the species come in contact with one another. It should be acknowledged that although bighorn sheep numbers in Utah fluctuate and are affected by respiratory disease, that their numbers have greatly increased from less than 100 in the 1960's to approximately 4,000 in 2017. Likewise in the Uintas, bighorn sheep have gone from being considered nonexistent in the 1960's to a 2018 estimate of 162. However, the Forest Service recognizes that the Uintas bighorn sheep have evidence of disease and that there is a risk of contact with domestic sheep allotments. The HUWDSA reviews literature on possible pathogen transfer from domestic sheep to bighorn sheep, and analyzes the risk of contact of Uintas bighorn sheep to domestic sheep allotments. This analysis is found in the Assessment of the North Slope Uintas Bighorn Sheep Herds pages 17-37; the DEIS pages 142-156, 160-163,

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					and 165-168; the Biological Evaluation pages 12, 18-31, and 33-36.
Jeremy Gleed	20	3	Therefore, it is my opinion, and I would support, decreasing the grazing allotments in this region. The bottom line for sheep ranchers cannot be the only priority, we have to seek ways of prioritizing and preserving wild bighorn sheep and other impacted wildlife for our posterity.	Position, No Rationale	
Paul Cowley	21	1	RE: High Uintas Sheep EIS DEADLINE DEC 31 - Part 1 – Response to Jonathan Ratner, providing clarification about the Federal Register.	Process and Clarification	Jonathan what was published in the Federal Register is the Notice of Intent to complete an Environmental Impact Statement on the project. When we prepare to complete an Environmental Impact Statement this is a required step. Initially we were going to do an environmental assessment on the project but are now shifting this to an EIS so we are completing this step of the process. We will be sending out a scoping letter on the project, now that it will be an EIS. We anticipate that this will occur in late January or early February. There will a request for comment associated with scoping All comments received including those from the initial scoping (June 2014, the NOI notice and the upcoming scoping period) will be considered. Let me know if you have other questions. pc
Jonathan Ratner	22	1	High Uintas Domestic Sheep – Part 3	No Response Needed	Attachments for Review
Nike Stevens	23	1	I urge you to to select the non action alternative or an alternative that converts domestic sheep grazing to cattle grazing and discontinue domestic sheep grazing on these 10 allotments.	Potential Alternative	The Forest Service will look at this and consider the feasibility of this suggestion as a possible alternative for analysis.
Nike Stevens	23	2	Grazing of domestic sheep conflicts with providing habitat for populations of native predators including coyotes, black bears and pumas. Domestic sheep are notoriously vulnerable to native predators and their use of native predator range inevitably results in population control of these predators.	Wildlife Mgmt	Predator control is outside the scope of this analysis and outside the authority of the Forest Service. Additionally, the author of this comment has not provided any data on predator control for the purpose of protecting domestic sheep on the 10 allotments under analysis.

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Nike Stevens	23	3	Grazing of domestic sheep also precludes habitat use by bighorn sheep a native wildlife species due to disease transmission. There is no longer any doubt that disease transmission occurs, that nearly all domestic sheep carry diseases that transmit to bighorn or that the diseases transmitted are fatal to bighorn sheep.	Animal Disease Mgmt	Grazing or the presence of domestic sheep does not preclude habitat use by bighorn sheep. In fact, it has been documented that bighorn sheep can be attracted to domestic sheep. However, it is agreed that if contact is made between the species, then there is a risk of the transfer of a pathogen that can cause respiratory disease in bighorn sheep. The Forest Service also points out that the risk is not the transfer of disease, but rather the transfer of a pathogen that can cause respiratory disease in bighorn sheep. The Forest Service also points out that there are domestic sheep that do not carry these pathogens. The discussion of literature on possible pathogen transfer from domestic sheep to bighorn sheep, and analysis of risk of contact of bighorn sheep to domestic sheep allotments is found in the Assessment of the North Slope Uintas Bighorn Sheep Herds pages 17-37; the DEIS pages 142-156, 160-163, and 165-168; the Biological Evaluation pages 12, 18-31, and 33-36.
Nike Stevens	23	4	A third alternative to convert grazing from domestic sheep to cattle should be considered. Allowing cattle grazing on all or some of the allotments would drastically reduce conflicts with native wildlife. Cattle are much less vulnerable to native predators and much less likely to transmit disease to bighorn sheep.	Issues, Alternatives	See the Alternatives Considered, but not carried forward in the DEIS, under the section Allotment Conversion to Cattle. One of the primary reasons this would not be feasible is because the elevation of these allotments is considered to be too high for cattle to do well, and additionally, the terrain in several places on these allotments is too steep to be suitable for cattle (State of Utah, 2018a). In addition, fences would likely be required to implement a rotation schedule for the allotments. Another factor that makes this potential alternative not feasible is that to do this would require sheep producers to sell off all of their animals and purchase a new class of livestock. At present, the existing livestock operations are set up for sheep and not cattle, and to convert over would be costly if not financially and biologically impossible for the permittees.

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Jonathan Ratner	24	1	High Uintas Sheep Part 2	No Response Needed	Attachments for Review
Jonathan Ratner	25	1	Dear David, Enclosed, please find our scoping comments on the High Uintas domestic sheep EIS. We incorporate by reference all previous comments and attachments (both via email and on CD, including those of Yellowstone to Uinta Connection, Dr. John Carter) into these comments.	No Further Response Required	
Jonathan Ratner	25	2	The first thing that must be accomplished within this decision process is insuring that the process complies with NFMA.	Laws, Policies	All Forest Service project must be in compliance with the National Forest Management Act (NFMA), including that projects are consistent with Forest Plan requirements.
Jonathan Ratner	25	3	We see that the Forest Service could not pass the its own red face test, let alone judicial review, by signing a FONSI that would continue to render the 160,000 acres of Wilderness toxic to bighorn sheep, a Forest Service Sensitive Species. So from that front we applaud the move to an EIS. What we do not applaud is the Forest Service's devoted subservience to wishes of the livestock industry, because it is clear from the Federal Register notice that the Forest Service fully intends to continue prioritizing permitting domestic sheep over its NFMA duties to recover bighorn sheep habitat and protect designated Wilderness. This process must result in management that recovers the FS Sensitive Species, including bighorn sheep. We provide a range of Forest Service handbooks and manuals and other direction documents, highlighted in the applicable sections, to help insure compliance.	No Further Response Required, Position with no rationale	

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Jonathan Ratner	25	4	Please fully review these so that you ensure that the highlighted sections are fully implemented. In FSH 2209.13 please specifically note 92.11. In FSM 2320 specifically note Section .2 which requires: 2. Maintain wilderness in such a manner that ecosystems are unaffected by human manipulation and influences so that plants and animals develop and respond to natural forces. 3. Minimize the impact of those kinds of uses and activities generally prohibited by the Wilderness Act, but specifically excepted by the Act or subsequent legislation. 2320.3 1. Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation, or regulations. 2. Manage the use of other resources in wilderness in a manner compatible with wilderness resource management objectives. 3. In wildernesses where the establishing legislation permits resource uses and activities that are nonconforming exceptions to the definition of wilderness as described in the Wilderness Act, manage these nonconforming uses and activities in such a manner as to minimize their effect on the wilderness resource. 4. Cease uses and activities and remove existing structures not essential to the administration, protection, or management of wilderness for wilderness purposes or not provided for in the establishing legislation. 2323.21 Manage wilderness range in a manner that utilizes the forage resource in accordance with established wilderness objectives (36 CFR 293.7) 2323.31 is particularly applicable here: 1. Provide an environment where the forces of natural selection and survival rather than human actions determine which and what numbers of wildlife species will exist. 2. Consistent with objective 1, protect wildlife and fish indigenous to the area from human caused conditions that could lead to Federal listing as threatened or endangered. 3. Provide protection for known populations and aid recovery in areas of previous habitation, of federally listed threatened or endangered species and their habitats. 2323.32 5. Apply the "Policies and Guidelines for Fish and Wildlife Management in Wilderness and Primitive Areas," developed jointly by the Forest Service, Bureau	Laws, Policies	The Forest Service is required to follow laws, regulation, and agency directives. As such, the project will be compliant with the Wilderness Act and the directives that are associated with grazing in the wilderness.

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			of Land Management, and the International Association of Fish and Wildlife Agencies in a practical, reasonable, and uniform manner in all National Forest wilderness units. Use the guidelines as a foundation for or as addendums to State or individual wilderness cooperative agreements. 2323.33C Predacious mammals and birds play a critical role in maintaining the integrity of natural ecosystems. Consider the benefits of a predator species in the ecosystem before approving control actions. The Regional Forester may approve predator control programs on a case-by-case basis where control is necessary to protect federally listed threatened or endangered species, to protect public health and safety, or to prevent serious losses of domestic livestock. Focus control methods on offending individuals and under conditions that ensure minimum disturbance to the wilderness resource and visitors. Poison baits or cyanide guns are not acceptable. Poison bait collars may be approved. The U.S. Fish and Wildlife Service or approved State agencies shall carry out control programs. The Forest Service is responsible for determining the need for control, the methods to be used, and approving all proposed predator damage control programs in wilderness (FSM 2650). Only approve control projects when strong evidence exists that removing the offending individual(s)will not diminish the wilderness values of the area. Departmental Regulations 9500-4 require: 1. Manage "habitats for all existing native and desired nonnative plants, fish, and wildlife species in order to maintain at least viable populations of such species." 2. Conduct activities and programs "to assist in the identification and recovery of threatened and endangered plant and animal species." 3. Avoid actions "which may cause a species to become threatened or endangered." FSM 260.22 requires: 1. Develop and implement management practices to ensure that species do not become threatened or endangered because of Forest Service actions. 2. Maintain viable populations of all native and desired nonnative wildlife, fish, and plant species in habitats distributed throughout their geographic range on National Forest System lands. 3. Develop and implement management objectives for populations and/or		

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			habitat of sensitive species. 2670.32 requires: 2. Review programs and activities as part of the National Environmental Policy Act of 1969 process through a biological evaluation, to determine their potential effect on sensitive species. 3. Avoid or minimize impacts to species whose viability has been identified as a concern. 4. Analyze, if impacts cannot be avoided, the significance of potential adverse effects on the population or its habitat within the area of concern and on the species as a whole. (The line officer, with project approval authority, makes the decision to allow or disallow impact, but the decision must not result in loss of species viability or create significant trends toward federal listing.) 2670.44 requires: 7. Develop Forest Service recovery strategies to implement approved Recovery Plans. Apportion recovery objectives among forests. In cooperation with the FWS and States, establish recovery objectives in the absence of, or interim to, approved Recovery Plans; integrate these objectives with regional and forest plans. 8. Identify and approve management strategies to achieve conservation. 2670.45 requires: 2. Develop quantifiable recovery objectives and develop strategies to effect recovery of threatened and endangered species. Develop quantifiable objectives for managing populations and/or habitat for sensitive species. 4. Determine distribution, status, and trend of threatened, endangered, proposed, and sensitive species and their habitats on forest lands. Manual 2209.13 requires the development of DFC's that are quantifiable and contain timeframes.		
Jonathan Ratner	25	5	The next critical element is a biologically-based, science-based risk assessment. The risk assessment must take into consideration the fact that current science requires at least a 9 mile buffer surrounding bighorn sheep use areas and habitats to reduce potential for disease transmission. The recent R4 modeling severely underestimated foray distances and amounts, as well as eliminated nearly 50% of the location data. The Forest Service also must discuss population trends and viability of the herds in question. These are the critical questions that an adequate NEPA process must answer. What is a viable population of BHS?	Wildlife/Animals Mgmt	The Forest Service is aware of the 9 mile separation buffer (separation of domestic sheep from bighorn sheep) recommended by WAFWA in their 2012 guidelines. However, the ROC model is updated research since the 2012 WAFWA guidelines and is the best available science for estimating the risk of bighorn sheep contact with domestic sheep allotments, and is based on a prolifera of data and research (O'brien et. al. 2014, Carpenter et. al. 2014, USDA FS 2015). The model estimates foray distances out 45 kilometers beyond the

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			Without that there is no support for the usual, bogus and unsupported species call "may adversely impact individuals…." The NEPA document must fully discuss and implement the Payette Principles and the Payette Science Review and the 2 RMRS publications regarding bighorn sheep management. The recent decision on the Payette National Forest provides extensive discussions and analysis of BAS in relation to BHS and its implementation for domestic sheep grazing. This information can be found at http://www.fs.fed.us/r4/payette/publications/big_horn/index.shtml On November 25th, 2008 the Chief of the Forest Service ordered all Regional Foresters "I ask that you seek to provide effective separation between domestic sheep and goats and wild sheep to minimize the likelihood of disease transmission to wild sheep. This includes careful review of the Payette Principles http://www.mwvcrc.org/bighorn/payetteprinciples.pdf and the Western Association of Fish and Wildlife Agencies (WAFWA) June 21, 2008, report entitled: Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat: http://www.mwvcrc.org/bighorn/wafwawildsheepreport.pdf ." (emphasis added) Effective separation under the WAFWA Guidance and the Payette Principles requires a 9 mile buffer or effective geographic barriers. The RMRS publication, Rocky Mountain Bighorn Sheep - A Technical Conservation Assessment which states "Because disease may represent the most significant threat to bighorn sheep in Region 2, especially on national forests with domestic sheep grazing allotments in or near bighorn sheep habitat, the creation of effective separation between bighorns and domestic sheep and goats is likely critical for preventing disease epizootics in areas where there is potential for contact. BLM Guidelines (Bureau of Land Management 1992) suggest maintaining a minimum buffer of 13.5 km (9 miles) between domestic sheep and goats and wild sheep on BLM lands to minimize the risk of contact between the two groups." and "One of the more important activities that directly affect bighorns is domestic livestock grazing in bighorn sheep habitat. Bighorns are negatively impacted by disease transmission from domestic		Core Herd Home Range. The Forest Service is also aware of recommendations to provide separation of bighorn sheep and domestic sheep/goats IF the preferred management is solely to support healthy bighorn sheep herds. The ROC model was initially conducted by the intermountain Region. It identified through a geographic information system analysis that considered key bighorn sheep habitat features. This was reviewed by the State of Utah Division of Wildlife Resources. The bighorn sheep core herd home range was identified by taking the known locations of bighorn sheep in the herds during key times of the year to identify high use area during those key times. The known locations included all points regardless of who collected the information. Duplicate or non-relevant points (points associated with deployment or collection of the tracking collars) were eliminated from the analysis. This analysis was initially conducted by the Region and modification of selected periods of the year, and the inclusion of new location data was done in coordination with the Intermountain Region. The Risk of contact analysis was also done by the Intermountain Region. Results of the analysis were reviewed for this project and incorporated into the wildlife analysis. Public review of the wildlife analysis is part of this project. The analysis discusses the Uintas bighorn sheep herd estimate trends and factors that may affect their viability. Viability as defined in the 2012 Planning Rule is a species that continues to persist over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments. The Forest Service is aware of the bighorn sheep information from the Payette. The Forest Service is also aware of and reviewed a prolifera of bighorn sheep disease and pathogen transfer literature in the Assessment of the North Slope Uintas Bighorn Sheep Herds and the analysis in the HUWDSA. The public is welcome to provide comments on why certain

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			livestock, especially domestic sheep and goats. Areas that have been grazed by domestic sheep may not be suitable areas for wild sheep for up to four years after grazing has been discontinued (Jessup 1985). Bunch et al. (1999) suggested that domestic and wild sheep should never be allowed to occupy the same areas because of the potential for disease transmission and the risk of a major die- off."		publications may or may not be applicable along with other reports to be considered. We welcome this exchange to identify and refine the information to be considered prior to making a final decision. The Forest Service points out that disease transmission from domestic sheep to bighorn sheep is not necessarily the issue, but rather the risk of pathogen transfer from domestic sheep to bighorn sheep. Additionally, the citations in this comment regarding the recommendation of a 4 year time span after domestic sheep have used an area before bighorns should be allowed in the same area is outdated and not supported in the latest research. The discussion of literature on possible pathogen transfer from domestic sheep to bighorn sheep, and analysis of risk of contact of bighorn sheep to domestic sheep allotments is found in the Assessment of the North Slope Uintas Bighorn Sheep Herds pages 17-37; the DEIS pages 142-156, 160-163, and 165-168; the Biological Evaluation pages 12, 18-31, and 33-36. O'Brien, J. M., C. S. O'Brien, C. McCarthy, T. E. Carpenter. 2014. Incorporating foray behavior into models estimating contact risk between bighorn sheep and areas occupied by domestic sheep. Wildlife Society Bulletin 38(2):321-331; 2014; DOI: 10.1002/wsb.387 Carpenter, T. E., V. L. Coggins, C. McCarthy, C. S. O'Brien, J. M. O'Brien, T. J. Schommer. 2014. A spatial risk assessment of bighorn sheep extirpation by grazing domestic sheep on public lands. Preventive Veterinary Medicine 114 (2014) 3-10. USDA FS 2015. Intermountain Region BHS/Domestic Sheep-Risk Assessment for Region 4 National Forests, Uinta-Wasatch-Cache-and Ashley Forests, Results and Responses.
Jonathan Ratner	25	6	The Forest Service must close sheep allotments where there is potential risk of contact.	Animal Disease Mgmt	This is an opinion statement that is unsupported. The Forest Service is not mandated to close domestic sheep allotments if there is a potential risk of contact. Additionally, the context in which this comment uses

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					the term "potential risk of contact" is subjective and open to interpretation. The Forest Service discussed levels of risk of contact in the analysis. The Forest Service also discusses disease issues, the risk of contact model, and other factors that may affect the Uinta's bighorn sheep. The discussion of literature on possible pathogen transfer from domestic sheep to bighorn sheep, and analysis of risk of contact of bighorn sheep to domestic sheep allotments is found in the Assessment of the North Slope Uintas Bighorn Sheep Herds pages 17-37; the DEIS pages 142-156, 160-163, and 165-168; the Biological Evaluation pages 12, 18-31, and 33-36.
Jonathan Ratner	25	7	As mentioned previously, other risk of contact models in R4 eliminated nearly 50% of BHS location data. For this ROC analysis the Forest Service must use all location data.	Position, No Rationale	The bighorn sheep location points that were deleted included duplicate points, points that were generated prior to the collar being installed on the animals or points generated after the collar was removed from the animals. The location points used in the model included all points generated when the collars were on the animals.
Jonathan Ratner	25	8	The Ashley National Forest Plan requires in its Standards: * Inventory areas having a high potentia1 for cultural sites by 1990. * Inventory areas having moderate and low potential for cultural sites by 1995. The Plan requires the Forest Service to manage the Wilderness "within levels of acceptable change" * Identify area Issues and concerns. * Define and describe opportunity classes. * Select indicators of resource and social conditions. * Inventory selected existing resource and social conditions. * Specify standards for resource and social Indicators for each opportunity class. * Reestablish native species classified as sensitive, threatened or endangered.	Statement of Laws, Policies	The Forest Service must be in compliance with both Forest Plans. As such, the project and its alternatives will be in compliance with the Forest Plans.
Jonathan Ratner	25	9	(NOTE: this would include areas where bighorn sheep have been extirpated because of the Forest Service's misguided prioritization of welfare ranchers over their NFMA species duties)	Position, No Rationale	

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Jonathan Ratner	25	11	* By 1988 place all allotments under management designed to protect the wilderness resources. * Manage livestock use within present capacity of allotment. * Maintain natural vegetative composition and diversity. * Complete aquatic inventories using General Aquatic Wildlife Survey (GAWS) and R-l stream channel stability ratings on stream orders 3. 4. and 5. Complete inventory of all streams. * Resource management activities will be allowed if they will not adversely affect any T and E or sensitive species.	Laws, Policies	The 1984 Utah Wilderness Act (Section 301[a]) states that grazing where previously established would be allowed to continue in accordance with the 1964 Wilderness Act Section 4(d)(4)(2). Grazing within the High Uintas Wilderness has been occurring since establishment of the Forest Service in the early 1900's. Management of resources within the wilderness is directed by The High Uintas Wilderness Management Plan. Following the 1960's inventory of range resources (forage production, species composition, ground cover, soil stability), tentative grazing capacity was set for individual allotments. Over time authorized grazing use has been adjusted based on monitoring of utilization and vegetative/soils trend. The Ashley and Uinta-Wasatch-Cache National Forests have been monitoring management impacts related to sheep grazing on the allotments under analysis for decades. Vegetative condition for the allotments are based on approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Uinta-Wasatch-Cache National Forest permanently established within the project area. Vegetation reports prepared for the analysis indicate that "the plant communities grazed by livestock are in satisfactory condition with stable trends or are trending toward desired condition." Current condition and trend on the allotments is indicated for about a 50 to 60 year period concurrent with livestock grazing (A. Huber) In order to meet the requirements of the Endangered Species Act, the Forest Service is required to analyze the effects to federally listed Threatened, Endangered, Proposed, and Candidate species through a Biological Assessment. Forest Service policy requires all Forests to evaluate the impacts of a project on identified Regional Forester's Sensitive species. This process is documented in a Biological Evaluation.

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Jonathan Ratner	25	12	NOTE: There is no rational or honest way the Forest Service could come to the conclusion that continued domestic sheep within bighorn sheep habitat would not adversely affect bighorn sheep which, of course, are a sensitive species.	Position, No Rationale	
Jonathan Ratner	25	13	* Complete Inventory of sensitive plant and animal species on the Forest to determine their occurrence, abundance, distribution, habitat requirements, and population. The High Uintas Wilderness Amendment requires: * The ability of soils to support naturally occurring vegetation communities is not significantly impaired by human activities.	Laws, Policies	These two items are plan components. The first is not project specific and is in reference to the Forest as a whole. The second item, is also a plan component. The analysis will consider soils and vegetation as a part of the EIS. Each resource will document the impacts from the alternatives.
Jonathan Ratner	25	14	Data needs to be collected and provided showing the currently permitted domestic sheep are not impairing vegetation communities.	Effects Analysis	The Ashley and Wasatch-Cache-Uinta National Forests have been monitoring management impacts related to sheep grazing on the allotments under analysis for decades. Monitoring intervals are periodic and average about 10 years between visits. Vegetative condition for the allotments are based on approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Wasatch-Cache-Uinta National Forest permanently established within the project area (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies, Gilbert Peak = 49 studies, Hessie Lake-Henrys Fork = 48 studies, Red Castle = 76 studies, East Fork-Blacks Fork = 115, and Middle Fork-Blacks Fork = 55 studies). Trend and condition were determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-

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					Step. Condition and trend derived from the long-term studies is summarized in vegetation reports prepared for this project. Appendices of these reports also provide site specific information such as condition, trend, years visited, histories, and other applicable information. The vegetation reports conclude that "the plant communities grazed by livestock are in satisfactory condition with stable trends or are trending toward desired condition." Vegetation desired condition is defined by two key characteristics relating to ground cover and plant species composition.
Jonathan Ratner	25	14	Data needs to be collected and provided showing the currently permitted domestic sheep are not impairing vegetation communities.	Rangeland Veg. Improvements	The Ashley and Wasatch-Cache-Uinta National Forests have been monitoring management impacts related to sheep grazing on the allotments under analysis for decades. Monitoring intervals are periodic and average about 10 years between visits. Vegetative condition for the allotments are based on approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Wasatch-Cache-Uinta National Forest permanently established within the project area (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies, Gilbert Peak = 49 studies, Hessie Lake-Henrys Fork = 48 studies, Red Castle = 76 studies, East Fork-Blacks Fork = 115, and Middle Fork-Blacks Fork = 55 studies). Trend and condition were determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-

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					Step. Condition and trend derived from the long-term studies is summarized in vegetation reports prepared for this project. Appendices of these reports also provide site specific information such as condition, trend, years visited, histories, and other applicable information. The vegetation reports conclude that "the plant communities grazed by livestock are in satisfactory condition with stable trends or are trending toward desired condition." Vegetation desired condition is defined by two key characteristics relating to ground cover and plant species composition.
Jonathan Ratner	25	15	* Natural processes and the forces of natural selection determine the diversity of wildlife and fish habitat and species.	Laws, Policies	This comment is generally true for the Uinta's Wilderness. One exception to this is the Utah Division of Wildlife Resources (UDWR) management of fish and game species. Big game species such as bighorn sheep, elk, deer, and mountain goat are managed and manipulated by the Utah Division of Wildlife Resources. Bighorn sheep in particular have been manipulated by the UDWR through the introduction of bighorn sheep in the Uintas in 1983 and the subsequent introductions, augmentations, removal, culling, and hunting.
Jonathan Ratner	25	16	Current domestic sheep grazing permitted by the Forest Service is violating this requirement. Currently, bighorn sheep populations and occupied habitat are controlled, not be natural processes and natural selection, but upon domestic sheep use which renders bighorn sheep habitat toxic. The Forest Service cannot comply with the amendment direction above and continue permitting domestic sheep.	Position, No Rationale	
Jonathan Ratner	25	17	* The High Uintas Wilderness acts as a component to maintain indigenous species presently existing in the area. Again, indigenous species (bighorn sheep) cannot be maintained in the presence of domestic sheep and so this direction cannot be complied with if the Forest Service chooses to place the interests of a few permittees above its NFMA duties to protect and recover Sensitive Species, particularly in this Wilderness Area.	Position, No Rationale	

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Jonathan Ratner	25	18	* In order to define standards for some wildlife and fisheries desired conditions, baseline data such as for Neotropical bird populations, rate of stream bank erosion, and acres of habitat available to potential TES resident species needs to be collected.	Laws, Policies	This is statement is an opinion and not supported. However, the Forest Service has conducted wildlife surveys in the allotments including breeding bird surveys. There are three sensitive species (bighorn sheep, northern goshawk, and great gray owl) that have habitat within at least one of the allotments. Habitat has been mapped for bighorn sheep and northern goshawk, and monitoring is done annually for these two species. Although, the great gray owl has habitat on one or more of the allotments, the Uinta's are just outside the southern end of their range and any detection of this species would be considered by some to be an accidental occurrence. Refer to the BE pages 3-14, and 18-21; and Wildlife Specialist Report pages 3-11. The status of streambank erosion can be found in either the range, hydrology, or fisheries reports.
Jonathan Ratner	25	19	It appears that this requirement has not been implemented. Insure that it is implemented prior to the EIS being released.	Position, No Rationale	
Jonathan Ratner	25	20	* Results of livestock grazing are consistent with desired condition of water, soils, wildlife, and vegetation.	Laws, Policies	Based upon approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Uinta-Wasatch-Cache National Forest permanently established within the project area (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies, Gilbert Peak = 49 studies, Hessie Lake-Henrys Fork = 48, Red Castle = 76 studies, East Fork-Blacks Fork = 115 studies, Middle Fork-Blacks Fork = 55 studies) the vegetative conditions are overall in satisfactory condition. Satisfactory condition is defined as meeting desired conditions or trending towards desired condition. Trend and condition were and are determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend

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					analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-Step. These methods are used to determine ground cover, plant community composition, forage utilization, riparian and stream bank conditions, water quality, compliance with grazing management practices or other grazing permit and/or annual operating instructions, and any other pertinent desired condition parameters.
Jonathan Ratner	25	21	Again, livestock grazing is not consistent with desired conditions for wildlife.	Position, No Rationale	
Jonathan Ratner	25	22	* Human induced change is temporary, minor, and less than in Class II and III. Soil compaction and minor vegetation loss associated with human related activities is temporary, discontinuous, and limited in extent to the area of activity. Human induced changes to soils, water and air quality, wildlife habitats, natural fire regimes, and vegetation do not disrupt the continuity of natural processes within the watershed.	Laws, Policies	There are no Class I Wilderness Designations in the Project Area.
Jonathan Ratner	25	23	The human induced changes caused by the Forest Service's permitting of domestic sheep are neither temporary, under any reasonable interpretation of the word or minor as you are rendering over a hundred thousand acres of Wilderness, toxic to a native species on the Sensitive Species List. Clearly, the continued permitting of domestic sheep cannot rationally be seen by the Forest Service as not disrupting the continuity of natural processes.	Position, No Rationale	
Jonathan Ratner	25	24	* We recognize there are areas of unsatisfactory range conditions in the wilderness. They are localized and not widespread. Groundcover requirements provided in standard MA01015 will begin to address these conditions. On the Wasatch Cache portion of the wilderness, utilization standards from the 1996 Rangeland Health Forest Plan amendment will also be applied. Even so, we know these problems will not be corrected overnight.	Laws, Policies	Based upon approximately 771 long-term studies from the Ashley National Forest and 343 long-term studies from the Uinta-Wasatch-Cache National Forest permanently established within the project area (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies, Gilbert Peak = 49 studies, Hessie Lake-Henrys

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			Improvements in alpine settings or sites with harsh climatic conditions take time to heal. In the Wasatch Cache Forest Plan, we find the following requirements: * Management actions move habitat conditions toward Historic Range of Variability (HRV), contribute to recovery of listed species, and maintain or improve conditions for sensitive species. Human activities are at a level that allows species to maintain desired distribution during critical life stages. Habitat conditions support populations of species for recreational, traditional and cultural significance.		Fork = 48, Red Castle = 76 studies, East Fork-Blacks Fork = 115 studies, Middle Fork-Blacks Fork = 55 studies) the vegetative conditions are overall in satisfactory condition. Satisfactory condition is defined as meeting desired conditions or trending towards desired condition. Trend and condition were and are determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-Step. These methods are used to determine ground cover, plant community composition, forage utilization, riparian and stream bank conditions, water quality, compliance with grazing management practices or other grazing permit and/or annual operating instructions, and any other pertinent desired condition parameters. The most conspicuous effects of permitted livestock use are select portions of the sheep driveway, narrow trails, some stream/trail junctions, salt areas and bedgrounds. Monitoring indicates these areas are small, localized and the exception to overall conditions. See the following Uinta-Wasatch-Cache National Forest studies: 8-10, 19-6A, 19-6B, 19-6C1, 19-9, 19-10, 19-11, 19-15B, 19-41A1, 19-41A2, 19-41A3, 19-41A4, 19-41A5, and 19-41B.
Jonathan Ratner	25	25	Continued permitting of domestic sheep within bighorn sheep habitat would disallow this from being achieved.	Position, No Rationale	

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Jonathan Ratner	25	26	Regarding Wilderness, the Forest Plan requires that: * Wilderness is managed and protected, for the plants and animals that live there and their habitat, the preservation of large, intact ecosystems, clean air and water, and primitive recreation opportunities. Natural ecological processes are dominant. Ecosystems are influenced by natural process with little or no intervention. * Native fish and wildlife species are featured and the habitat needs of species-at-risk receive protective measures where needed. Again, continued permitting of domestic sheep within bighorn sheep habitat would disallow this from being achieved. * 3b. Maintain pollinators and minimize impacts to pollinators or their habitats. * 3g. Maintain and/or restore tall forb communities to mid seral or potential natural community (PNC) status. * 3j. Manage Forest Service sensitive species to prevent them from being classified as threatened or endangered and where possible provide for delisting as sensitive (FSM 2670). * 5.a. Fully implement the Rangeland Health Amendment Forestwide by finalizing riparian classification and notifying permit holders of utilization standards based on this classification within 1 year, * 5.b. Validating key areas and focusing monitoring of utilization standards in Allotments containing riparian dependent TES within 3 years, * 5.c. Developing ground cover potentials for missing vegetation cover types within 2 years, * 5.d. Assess/validate existing conditions and continue establishing long-term trend monitoring for 10% of Allotments annually. * 5.e. Establish clear expectations with all permit holders to achieve stated purposes within 1 year. * 5.f. Assess and prioritize noxious weed infestations for appropriate treatment within 1 year. * (G24) Management activities that negatively affect pollinators (e.g. insecticide, herbicide application and prescribed burns) should not be conducted during the flowering period of any known Threatened, Endangered, and Sensitive plant populations in the application area. An exception to this guideline is the application of Bacillus thuringiensis.	Laws, Policies	Impacts to Wilderness are discussed in terms of how the alternatives will affect the area's degree of being untrammeled, the effects on the apparent naturalness, and the effect on the ability to find solitude and unconfined recreation.
Jonathan Ratner	25	27	This, of course, would apply to livestock removing flower sources	Position, No Rationale	

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Jonathan Ratner	25	28	* (G75) Annual operating instructions (and/or Allotment Management Plans) should be evaluated and additional site-specific objectives defined if needed for any or all of the following five parameters: - stubble height on selected key species on the greenline, - stubble height on selected key species and/or the amount of bare - ground within the riparian zone but away from the greenline, - riparian woody browse utilization (trees and shrubs), - stream bank trampling on key reaches, and - stubble height and/or incidence of use on key species in the uplands.	Laws, Policies	Existing Allotment Management Plans (AMP) will be updated following completion of this analysis. Standards and guidelines for livestock management and utilization within the Forest Plans and EIS will be incorporated into the AMP's. Annual Operating Instructions are developed on an annual basis and include standards contained within the AMP and any additional management criteria deemed necessary due to current condition or unforeseen circumstances such as precipitation patterns, fire, floods, etc.…
Jonathan Ratner	25	29	The Bighorn Sheep Conservation Assessment states that management needs to focus on: - eliminating the potential for contact between bighorn sheep and domestic sheep and goats - managing bighorns and their habitat in a metapopulation context by maintaining connectivity among subpopulations - minimizing human disturbance in sensitive habitats (i.e., lambing and winter ranges) As is well known, it only takes contact between one bighorn and one domestic sheep to cause a disease outbreak and corresponding crash of the population. The NEPA document must discuss the use of habitat outside the CDOW's bighorn range polygons or the fact that "Extensive movement patterns by male bighorn sheep during the rutting season may increase their risk of coming into contact with domestic sheep and contribute to the perpetuation of disease in this species and significantly influence the probability of long-term persistence in isolated sheep populations (Gross et al. 2000)." Rocky Mountain Bighorn Sheep - A Technical Conservation Assessment. The Conservation Assessment continues "Because disease may represent the most significant threat to bighorn sheep in Region 2, especially on national forests with domestic sheep grazing allotments in or near bighorn sheep habitat, the creation of effective separation between bighorns and domestic sheep and goats is likely critical for preventing disease epizootics in areas where there is potential for contact. BLM Guidelines (Bureau of Land Management 1992) suggest maintaining a minimum buffer of 13.5 km (9 miles) between domestic sheep and goats and wild	Wildlife Mgmt	The Forest Service is aware of the 9 mile separation buffer (separation of domestic sheep from bighorn sheep) recommended by WAFWA in their 2012 guidelines and in the BLM guidelines that this comment refers to. The Forest Service is also aware of the Conservation Assessment referred to in this comment. The Forest Service is also aware that the 9 mile separation is recommended to provide separation of bighorn sheep and domestic sheep/goats IF the preferred management is solely to support healthy bighorn sheep herds. The ROC model is the best available science for estimating the risk of bighorn sheep contact with domestic sheep allotments, and is based on a prolifera of data and research (O'brien et. al. 2014, Carpenter et. al. 2014, USDA FS 2015). The model estimates foray distances out 45 kilometers beyond the Core Herd Home Range. The ROC model was initially conducted by the intermountain Region. It identified through a geographic information system analysis that considered key bighorn sheep habitat features. This was reviewed by the State of Utah Division of Wildlife Resources. The bighorn sheep core herd home range was identified by taking the known locations of bighorn sheep in the herds during key times of the year to identify high use area during those key times. The known locations included all points regardless of who

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			sheep on BLM lands to minimize the risk of contact between the two groups." and "One of the more important activities that directly affect bighorns is domestic livestock grazing in bighorn sheep habitat. Bighorns are negatively impacted by disease transmission from domestic livestock, especially domestic sheep and goats. Areas that have been grazed by domestic sheep may not be suitable areas for wild sheep for up to four years after grazing has been discontinued (Jessup 1985). Bunch et al. (1999) suggested that domestic and wild sheep should never be allowed to occupy the same areas because of the potential for disease transmission and the risk of a major die-off." RMRS-GTR-209 states "The disease related conflict between domestic sheep and bighorn sheep was tested in the United States District Court (Oregon) in 1995. The following summarizes United States Magistrate Judge Donald C. Ashmanskas' findings: "Scientific research supports a finding that when bighorn sheep intermingle with domestic sheep, large numbers of bighorn sheep die. While the exact reason for this result may be in question, it is clear that the die-offs occur. An incompatibility exists between the two species, and there is no way to avoid the incompatibility other than to keep the domestics and the bighorns separate" (Ashmanskas 1995)." Since that time there have been a number of other similar rulings where the Forest Service failed to implement appropriate measures to provide separation." This same Forest Service publication continues "The scientific literature and expert panels support the conclusion that bighorn and domestic sheep/goats should not occupy the same ranges simultaneously or be managed in close proximity to each other if maintenance of a bighorn sheep population is a management objective. The literature is clear regarding the high probability of bighorn sheep dying of pneumonia following contact with domestic sheep." It concludes by stating "In landscapes where management objectives include the maintenance or enhancement of bighorn sheep populations, the risk of potential of disease transmission between domestic sheep/goats and bighorn sheep must be addressed. The available information supports creating spatial and/or temporal separation between		collected the information. Duplicate or non-relevant points (points associated with deployment or collection of the tracking collars) were eliminated from the analysis. This analysis was initially conducted by the Region and modification of selected periods of the year, and the inclusion of new location data was done in coordination with the Intermountain Region. The Risk of contact analysis was also done by the Intermountain Region. Results of the analysis were reviewed for this project and incorporated into the wildlife analysis. Public review of the wildlife analysis is part of this project. The Forest Service is aware of the bighorn sheep information from the Payette. The Forest Service is also aware of and reviewed a prolifera of bighorn sheep disease and pathogen transfer literature (including much of the literature cited in this comment) in the Assessment of the North Slope Uintas Bighorn Sheep Herds and the analysis in the HUWDSA. The public is welcome to provide comments on why certain publications may or may not be applicable along with other reports to be considered. We welcome this exchange to identify and refine the information to be considered prior to making a final decision. The Forest Service points out that disease transmission from domestic sheep to bighorn sheep is not necessarily the issue, but rather the risk of pathogen transfer from domestic sheep to bighorn sheep. Additionally, the citations in this comment regarding the recommendation of a 4 year time span after domestic sheep have used an area before bighorns should be allowed in the same area is outdated and not supported in the latest research. The discussion of literature on possible pathogen transfer from domestic sheep to bighorn sheep, and analysis of risk of contact of bighorn sheep to domestic sheep allotments is found in the Assessment of the North Slope Uintas Bighorn Sheep Herds pages 17-37; the DEIS pages 142-156, 160-163,

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			domestic sheep/goats and bighorn sheep as a prudent management technique to manage the risk of disease transmission. (Callan and others 1991; Coggins 1988, 2002; Coggins and Matthews 1992; Desert Bighorn Council 1990; Festa-Bianchet 1988; Foreyt 1989, 1990, 1992a, 1992b, 1994, 1995; Foreyt and Jessup 1982; Foreyt and others 1994; Garde and others 2005; Goodson 1982; Hunt 1980; Hunter 1995a; Hunter and others in prep; Jessup 1980, 1982, 1985; Kistner 1982; Martin and others 1996; Onderka 1986; Onderka and Wishart 1988; Pybus and others 1994; Ward and others 1997; Wishart 1983). Recent disease incidents involving domestic goats have resulted in the same conclusion (Garde and others 2005; Heffelfinger 2004; Jansen and others 2006). For a review of the disease transmission issue, we request you review pages 3-10 to 3-14 of the Payette National Forest DSEIS available at: http://www.fs.fed.us/r4/payette/publications/big_horn/DSEIS_Chapter_3_Pages_1_throu gh_33.pdf The scoping notice mentions a number of alternatives to be analyzed, but with the exception of the no grazing alternative, none utilize a science-based process that includes the minimum 9 mile buffer. This science-based alternative must be fully analyzed.		and 165-168; the Biological Evaluation pages 12, 18-31, and 33-36. The DEIS considered other alternatives including one that removes domestic sheep form areas of overlap with the Core Herd Home Range. A review of these considered alternatives can be found in the DEIS pages 28-30. O'Brien, J. M., C. S. O'Brien, C. McCarthy, T. E. Carpenter. 2014. Incorporating foray behavior into models estimating contact risk between bighorn sheep and areas occupied by domestic sheep. Wildlife Society Bulletin 38(2):321-331; 2014; DOI: 10.1002/wsb.387 Carpenter, T. E., V. L. Coggins, C. McCarthy, C. S. O'Brien, J. M. O'Brien, T. J. Schommer. 2014. A spatial risk assessment of bighorn sheep extirpation by grazing domestic sheep on public lands. Preventive Veterinary Medicine 114 (2014) 3-10. USDA FS 2015. Intermountain Region BHS/Domestic Sheep-Risk Assessment for Region 4 National Forests, Uinta-Wasatch-Cache-and Ashley Forests, Results and Responses.
Jonathan Ratner	25	30	Q-fever is a highly infectious disease transmitted to humans working in the agricultural field with sheep and goats. Q-fever is considered a potential 'Bioterrorism Agent' and is extremely contagious. The most common reservoir for the disease (caused by a Rickettsia: Coxiella burnetii) includes domestic sheep and humans who work with sheep are commonly infected with the disease (see: http://www.cdc.gov/ncidod/dvrd/qfever/index.htm) Domestic sheep grazed on public lands serve as vectors and reservoirs for innumerable disease pathogens, many of which are contagious and can affect humans. The EIS needs to analyze the likelihood of human exposure and potential impact of domestic sheep contracting, harboring, and transmitted diseases including but not limited to: Rocky Mountain Spotted Fever (Rickettsia rickettsii) Lyme disease Human granulocytic and monocytic ehrlichiosis babesiosis Relapsing fever Colorado tick fever (CTF)	Econ. Actions, Analyses	A review of the Q-fever material on the website provided suggest that those most at risk are people who work on farms during the birthing period. This occurs off forest for the livestock associated with these allotments. Recreationalists are not among the high-risk groups identified. To review the potential for disease transfer to human is outside the scope of this analysis. Livestock have been grazed in this area for over 100 years and no major disease transfer from animals to humans has been identified. Nor have domestic animals been identified as a major vector for parasite or disease transfer. Ticks are suspected to be found within the Uinta Mountains in both area used and not used by livestock. We have reviewed the demographics of each of the counties associated with the analysis to verify if one particular group is harmed over another. We have

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			tularemia tick paralysis Domestic sheep carry and spread other infectious diseases for which the above rationale regarding Q-fever and tick-borne illnesses equally applies. All diseases/pathogens known or reasonably suspected to be transmittable from domestic sheep to humans and from the environment to humans including but not limited to transmissible spongiform encephalopathies like scrapie, anthrax, and others should be included in analysis concerning the alternatives' likely impact to the human environment and human health. The Environmental Protection Agency (EPA) defines Environmental Justice as: "The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies." The EIS needs to analyze for each alternative the impacts to humans identified by race, national origin, or income. Adequate analysis of the impact to environmental justice is particularly relevant to the grazing of domestic sheep on FS administered lands because immigrant laborers are often exclusively and/or disproportionately selected as sheepherders via the federal government's H2-A visa program, a guest worker program that is directly selective of laborers who are readily identifiable as a condition of their national origin, race and income. The H2-A program is exclusively available to immigrants originating in select qualifying countries ("national origin"), almost exclusively consisting of minority participants ("race") whose application into the program is in direct relation to their underprivileged economic condition ("income"). Even in the absence of the H2-A program, it is common practice in the west to hire sheepherders who are often minority, Peruvian, Mongolian and other particular identifiable national origins, and/or who are economically underprivileged. The EIS needs to analyze and disclose		found no evidence that suggests this.

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			information about racial, economic, and national origin demographics of sheepherders who will be working on these allotments if sheep grazing is permitted.		
Jonathan Ratner	25	31	An analysis and disclosure of population demographics (race, national origin, & class) affected by any federal action is mandated by NEPA and the implementation of Executive Order 12898 (EO 12898) and is necessary to avoid "disproportionately high and adverse" effects on minority and low-income populations. The analysis and disclosure required by NEPA similarly helps to provide public oversight and ensure compliance with important federal statutes including Title VI of the Civil Rights Act of 1964 (Title VI).	Laws, Policies	See the social economic report.
Jonathan Ratner	25	32	The EIS needs to collect and analyze this information. The EIS needs to analyze whether any of the alternatives disproportionately, and in effect discriminatorily, subjects racial, economic, and/or national peoples (and/or individuals) to environmental and human health risks in violation of NEPA and the principles of Environmental Justice.	Effects Analysis	The analysis considered the make-up of the communities that would be affected by a decision on the ten allotments. See the social economic report.
Jonathan Ratner	25	33	Executive Order 12898 further directs each federal agency to analyze, assess, and compare the collected information to determine whether the action potentially disproportionately, and in effect discriminatorily, subjects racially, economically, or nationally distinct populations (or individuals) to environmental and human health risks. EO 12898 Section 3-302 states: (a) "[…] each federal agency, whenever practicable and appropriate, shall collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. To the extent practical and appropriate, Federal agencies shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations;	Laws, Policies	The Forests reviewed the social economic data associated with the affected populations and found no disproportionate effect associated with environmental justice.

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Jonathan Ratner	25	34	To comply with EO 12898 the EIS needs to: * Analyze environmental effects, including human health, economic, and social effects on minority populations and low-income populations. * Ensure that mitigation measures outlined or analyzed in EA's, EIS's, and ROD's, whenever feasible, address disproportionately high and adverse environmental effects or proposed actions on minority populations and low- income populations; and * Provide opportunities for community/public input in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving accessibility to public meetings, official documents, and notices to affected communities; Analysis must be included which considers whether permittee employees of distinct national, racial, or class origin are disproportionately, or in effect discriminatorily, subjected to environmental and human health risks.	Effects Analysis	Executive Order 12898 specifically focuses on the topic of environmental justice. The Forest Service Environmental Justice policy as it relates to NEPA is described below. "Executive Order 12898 and USDA departmental regulations provide the framework for considering environmental justice in NEPA. The memorandum accompanying the executive order identifies four important ways to consider environmental justice under NEPA; these items outline the Forest Service environmental justice policy. 1. Federal agencies are required to analyze the environmental effects, including human health, economic, and social effects of Federal actions, including effects on minority populations, low-income populations, and Indian tribes, when such analysis is required by NEPA. 2. Mitigation measures identified as parts of an environmental assessment (EA), a finding of no significant impact (FONSI), an environmental impact statement (EIS), or a record of decision (ROD), should, where feasible, address significant and adverse environmental effects of proposed Federal actions on minority populations, low-income populations, and Indian tribes. 3. Each Federal agency must provide opportunities for effective community participation in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of public meetings crucial documents, and notices. 4. Review of NEPA compliance… must ensure that the lead agency preparing NEPA analyses and documentation has appropriately analyzed environmental effects on minority populations, low-income populations, or Indian tribes, including human health, social, and economic effects (CEQ 1997, pp. 4–5). In the NEPA process, departmental regulations strongly recommend that agencies make robust efforts to encourage members of low-income and minority populations to help develop

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					and comment on possible alternatives. When environmental justice populations are present, efforts would include organizing public meetings to facilitate public input on the alternatives by these populations. Agencies should also notify interested or affected parties of the availability of draft NEPA documents and encourage comment. NEPA documents provide important opportunities to demonstrate how concerns raised by minority and low income populations during the scoping process have been considered in the development of alternatives as well as to provide opportunities to encourage additional input (USDA 1997, p. 31). "(USDA - Forest Service, Striving for Inclusion - Environmental Justice for Forest Service NEPA, February 2014) As a part of the HUW Domestic Sheep Analysis, impacts to socioeconomics were identified as key issues that will be fully explored and addressed in the Socioeconomics specialist report and consequently the EIS. As a part of that, not only will economic factors be considered, but also societal factors such as impacts to the ranching lifestyle, impacts to communities and impacts to any low income or minority populations if it is determined that those groups would be affected by this project. As a course of the NEPA process, considerable efforts are and will continue to be made to reach all people that could be affected by this project to keep them informed of the progress and the outcomes and findings of this project. The local Ute tribe and Shoshone tribe have been and will be continued to be informed at every stage of this project, and their comments and input and actively solicited.

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Jonathan Ratner	25	35	A fundamental aspect of NEPA is to take a "hard look" at current management, conditions, assumptions and implementation. A NEPA document that fails to analyze the following violates the purposes of NEPA: 1) Validity of assumptions from previous NEPA processes 2) Accuracy of predictions from previous NEPA processes 3) Adequacy of Forest Service implementation of previous decisions 4) Permittee compliance with permit terms and conditions, AMP's, AOIs and other requirements 5) effectiveness of actions taken in previous decisions These above items are absolutely critical to be part of this NEPA process. Without this critical link the validity of the current assumptions are baseless. Let's look at each one of these individually. Without analyzing the accuracy and validity of the assumptions used in previous NEPA processes one has no way to judge the accuracy and effectiveness of the current analysis and proposals. This vitiates the NEPA process. The predictions made in previous NEPA processes also need to be disclosed and analyzed because if the accuracy was not there most likely you are making the same predictions in the current process and does you are process again will be vitiated. A review of the adequacy of the FS's implementation of current AMP's and FP direction is essential to a valid NEPA process. For instance, if in previous processes the FS said they were going to do a certain monitoring plan or implement a certain type of management that these were never effectively implemented, that is incredibly important for the reader and the decision maker to know. If there have been problems with FS's implementation in the past, it is not logical to assume that implementation will now all of a sudden the appropriate.	Laws, Policies	With respect to the "hard look" doctrine - nowhere in any NEPA regulation is that term used. Rather that term has been developed by the courts in reference to a comprehensive and thorough effects evaluation. More specifically, the Hard Look - is a criteria used by the courts to judge NEPA sufficiency is the hard look standard. The “hard look” doctrine has no fixed meaning, rather it is a flexible standard applied by the judiciary in passing on agency compliance with NEPA’s directives. It is a standard used by the courts to establish the scientific rigor by which an agency has reached its decision. In practical terms, a hard look means that the agency has taken an honest look at all potential impacts. Important questions and inconsistencies are honestly discussed and applied to the site specific analysis. Notice the hard look is not truly technical (or scientific). It is a lay persons test. So hard look means that any reasonably intelligent, interested person should be able to review an agency's NEPA document – and decide on the written record – whether the agency has taken the necessary hard look. In regards to the purpose of NEPA, according to the National Environmental Policy Act (NEPA) of 1969, Section 2 [42 USC § 4231] the purpose of NEPA is to " To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality. "

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Jonathan Ratner	25	36	Another critical component is permittee compliance. If the permittee has have failed to properly comply with their permit terms and conditions and AMP requirements, including utilization requirements, rotation requirements and fence maintenance then it is absolutely critical to discuss this in the document and its effects on the proposed action. Permittee failure to comply with permit terms and conditions and other requirements shows two things, firstly that the permittee has a mail to implement even the minimal standards that are currently in place and secondly, it shows that the FS has failed to take decisive permit action to ensure compliance. Both of these are very important aspects that must be discussed for a valid NEPA process. Another critical component is an examination of the effectiveness of the actions taken in previous decisions. A classic example of this is fences and water developments. Often, new fences and water developments are proposed to solve riparian issues in spite of the fact that these have been used for many decades without correcting riparian issues. Doing more of the same does not lead to good results is not an effective strategy for public lands management.	Domestic Livestock, Grazing Mgmt and Position With No Rationale	Failure of permittees to follow the rules and regulations of their Term Grazing Permit are handled in accordance with R4 ID FSH 2209.13, Sec 16.2 and the Administrative Procedures Act.
Jonathan Ratner	25	37	The Forest Service must analyze, in a site-specific way, the capability of these lands on all three allotments to provide forage for livestock. This analysis needs to assess the availability of forage, the distances to water, and slopes not to exceed a certain limit depending on soil types. While the Forest Plan may have done a large-scale assessment of capability, that assessment needs to be verified at this site-specific level of analysis Capability involves only the four major issues of slope, distance to water, highly erodible soils and availability of palatable forage, and the Forest needs to assess at a site specific level whether the more general Forest Plan process is accurate considering the specific slopes, forage availability, and distances to water sources on the allotment. This analysis must also ground-truth the Forest Plan assessment of capability especially in regard to erodibility of soils. The Forest Service must complete a suitability analysis for the allotments. This process needs to include analysis of a variety of impacts and conflicts that will occur at differing levels of livestock grazing which need to be considered in the alternatives	Domestic Livestock, Grazing Mgmt	Need answer from Dustin

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			of the EA/EIS. Analysis of suitability necessarily will vary by alternative in the EA/EIS as differing assumptions need to be used with regard to defining protocols for suitability of "capable" lands for livestock grazing according to the level of livestock grazing impacts and conflicts which are deemed to be unsuitable when they conflict with other values such as wilderness, wildlife habitat, wildlife displacement, and negative impacts on recreation, Wilderness values, special status plants and animals including but not limited to Management Indicator Species (MIS) and species listed under the Endangered Species Act (ESA). For example, even if lands are determined to be capable of supporting livestock grazing, they may be unsuitable for that use if the soils are at risk of compaction, if water quality will be unacceptably degraded, if recreational activities will be compromised unacceptably, if wildlife habitat will be damaged or degraded, if native plant ecosystems and rare or sensitive plant species cannot sustain levels of livestock use and flourish, if predators will be routinely killed to protect sheep and cattle, if hikers and other users of these lands will be threatened and perhaps attacked by sheep guard dogs, if bighorn sheep are prevented from reestablishing within these allotments because of the risk of disease transmission from domestic sheep and if livestock serve as unacceptable vectors of weed seed dispersal. These conflicts and others need to be analyzed within a range of levels of livestock grazing as well as in a no- grazing alternative as part of the NEPA analysis. The suitability analysis also needs to reveal the impacts of sheep grazing and trailing on lands deemed non-capable but still proposed for crossing or trailing of livestock. This is especially important for cumulative effects analysis of sheep trailing and trampling on the batholithic soils found on these allotments. One aspect of the suitability analysis needs to address the likelihood of negative impacts of domestic sheep on bighorn sheep dispersing to or through the allotments, This part of the suitability analysis needs to be informed by the Payette National Forest in regard to domestic sheep and bighorn conflicts and risks of disease transmission.		

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Jonathan Ratner	25	38	The R4 Capability Suitability Protocol states for suitability: * Criteria for Rangeland Suitability: Once capability is determined, an assessment of suitability, by alternative, is conducted to address whether livestock grazing is compatible with management direction for a management area's other uses and values, and which, if any, other uses would be foregone with livestock grazing. Forest planning records should contain a description of the criteria used in the analysis to identify suitable rangelands. Advice for suitability criteria are listed below. Additional criteria may be developed if local conditions warrant. Situations listed below may or may not be suitable for livestock grazing depending on an overall evaluation of potential effects and opportunities to mitigate adverse effects: - Developed recreation sites or special use sites. - Special area designations such as Research Natural Areas. - Administrative sites and research facilities or study sites. - Key wildlife habitat areas (such as winter ranges). - Important habitats for TES species (viability considerations). - Noxious weed infestations where forage is not used by livestock or use would contribute to increase of the infestation. - Unique habitats such as bogs, fens, jurisdictional wetlands, or rare plant communities. - Areas where livestock grazing is impracticable due to economic considerations, either from a permittee or agency standpoint. - Transitory range created by timber harvest activities where the associated mitigation costs to protect timber resource values is excessive. - Areas where the social consequences and values foregone are not acceptable. (emphasis added)	Domestic Livestock, Grazing Mgmt	On Forest Service administered lands, domestic livestock grazing is permitted on those landscapes that are classified as both "capable" and "suitable" to support this management action. Capability is the potential of an area of land to produce resources, supply goods and services, and allow resource uses under an assumed set of management practices and at a given level of management intensity. Capability depends on current conditions and site conditions such as climate, slope, landform, soils and geology, as well as the application of management practices. Rangeland capability represents the biophysical determination of those areas that can sustain grazing. The following criteria are considered capable: Areas with less than 30% slopes for cattle and less than 45% slopes for sheep. Areas producing more than or having the potential to produce an average of 200 lbs. of forage/acre. Areas with naturally resilient soils (Not unstable or highly erodible soils). Areas where ground cover (vegetation, litter, rock > 3/4 in.) is sufficient to protect soil from erosion, the minimum percentage cover will be 60% unless local data is available for use in setting more specific ground cover requirements. Areas accessible to livestock (without such factors as dense timber, rock or other physical barriers). Areas within 1 mile of water or where the ability to provide water exists. Once capability is determined suitability of the landscapes are assessed to determine whether livestock grazing is, or is not, compatible with management direction for a management area's other uses and values. Other uses or values may include recreation areas, special land designations such as Research Natural Areas or botanical areas, campgrounds, administrative sites, etc. Forest Plan direction delineates land uses based upon these assessments. The sheep allotments under analysis have been classified as both capable and suitable for grazing, even with wilderness

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					area designation. These landscapes meet the criteria for capability and have been deemed suitable under their current Forest Plan. A couple of areas in the High Uinta Wilderness that are capable but have been classified as unsuitable for livestock grazing with preference given to other values include upper Uinta River drainage, Amethyst Basin, head of Burnt Fork drainage, and the head of Rock Creek drainage.
Jonathan Ratner	25	39	This is a short list of potential issues of suitability which apply generally to the allotments; however, it is not inclusive, and it is the duty of the Forest Service to fully assess criteria for suitability by developing a protocol for determining whether the impacts from livestock grazing at any level is incompatible and therefore unsuitable for lands which otherwise may be designated capable of supporting livestock grazing.	Position, No Rationale	
Jonathan Ratner	25	40	We look forward to working with the Forest Service in fulfilling the intent of NEPA, NFMA and the other statutes and regulations the Forest Sercivce works within, through a complete and accurate analysis of the impacts of the plan.	No Further Response Required	

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Philip Strobel	26	1	Dear Mr. Whittekiend: The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the High Uintas Wilderness Domestic Sheep Analysis project. In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we are providing scoping comments. The Forest Service is proposing to evaluate the effects of domestic sheep grazing on ten allotments on the north and south slopes of the Uinta Mountains located in the Ashley and Uinta-Wasatch-Cache National Forests in Duchesne and Summit Counties in Utah and Uinta County in Wyoming. The decision to be made is whether or not sheep grazing will continue on these allotments and if a site specific Forest Plan amendment is needed. The NOI states that preliminary issues that have been identified for analysis include impacts to Rocky Mountain bighorn sheep, wilderness, socioeconomics, recreation, soils, hydrology and vegetation	No Further Response Required	
Philip Strobel	26	2	Based on preliminary information, we would suggest also analyzing aquatic resources, and to a lesser extent, climate change impacts.	Effects Analysis	As a part of analyzing the effects for the EIS, aquatic resources will be analyzed, and climate change will be addressed as to how it could affect the project outcomes.
Philip Strobel	26	3	Aquatic Resources Existing Conditions Existing resource conditions provide the basis for an effective analysis of potential impacts. Therefore, the EPA recommends that the EIS include the following baseline aquatic resource information: * A map and summary of project area waters and downstream waters, including streams, lakes, springs and wetlands. It would be helpful if the summary identified high resource value water bodies and their designated beneficial uses (e.g., agriculture, fisheries, drinking water, recreation); * Watershed conditions, including vegetation cover and composition, soil conditions, and areas not meeting desired future conditions; * Surface water information, including available water quality data in relation to current standards, stream functional assessments, stream channel/streambank stability conditions, sediment loads, and aquatic life; * Types, functions and acreage of wetlands, riparian	Soils Mgmt, Water, Watershed Mgmt	The DEIS Affected Environment will contain information on precipitation patterns, drainage patterns, stream conditions, surface water quality including beneficial uses of water and impaired watersheds, water quality data on nutrients, bacteria, and total suspended solids, wetlands, floodplains, and municipal watersheds. Ground water conditions will not be analyzed in the DEIS because no groundwater issues were identified, as no livestock confinement areas, manure storage areas, or wells on the allotments where livestock have the potential to contaminate groundwater occur on the allotments. The DEIS Hydrology Effects Analysis section will contain assessments of livestock grazing on wetlands and riparian areas, water quality, and cumulative effects. The DEIS Soils Affected Environment

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			areas, and springs; * Available groundwater information, including quality and location of aquifers; and * A map and list of Clean Water Act (CWA) impaired or threatened water body segments within, or downstream of, the planning area, including the designated uses of the water bodies and the specific pollutants of concern. The Utah Department of Environn1ental Quality and the Wyoming Department of Enviromnental Quality can identify/validate any such CWA Section 303(d) listed water bodies potentially affected by the grazing allotments. Also, we would suggest consulting with the tribal environn1ental staff of the Uintah and Ouray reservation. Water Quality Data: Water quality data for the streams and lakes of the project area provide impotiant information as well as a baseline for future monitoring of impacts and evaluation of potential influence on downstream water quality. We recommend the EIS provide a summary of available information and monitoring data on water quality for the project area and downstream waters affected by the project area, including parameters such as total phosphorus, total nitrogen, Escherichia coli (E. coli), total suspended solids, turbidity, and temperature. It will also be important to include water quality data for parameters listed for impaired water bodies within or downstream of the project area. Identifying any significant gaps in available data may be helpful in developing the monitoring plan. Effects to Wetlands and Riparian Areas The EPA recommends that the EIS include a summary description of the types of impacts that may result from grazing to wetlands and associated springs. Such impacts may include functional conversion of wetlands (e.g., forested to slu-ub-scrub); changes to suppo1iing wetland hydrology (e.g., snow melt patterns, sheet flow, and groundwater hydrology); and wetland disturbance. We also recommend that the EIS describe how the Forest Service intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands" as described in Executive Order (EO) 11990, Protection of Wetlands. Water Quality Impacts of Soil Disturbance and Vegetation Changes The potential impacts of grazing on water quality may stem from vegetation loss,		and Effects Analysis will contain information on soils erosion and soil disturbance. An assessment of the effects of alternatives to water quality and stream conditions, and monitoring needs will be included in the analysis.

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			accelerated soil loss, bank erosion, soil compaction, increased surface storm flow, reduced stream base flows from decreased infiltration to groundwater, and changes in water temperature associated with shade loss or channel widening. Based on the Forest Service's experience with grazing in the project area, we recommend that the EIS include an assessment of each alternative 's potential impacts and benefits to aquatic resources that may stem from the drivers listed above, including impacts to water quality, stream and wetland processes, and macroinvertebrate and fish populations/habitat. Stream Function/Condition In addition to impacting water quality, grazing that traverses streams or dislodges erosive soils can have disproportionate impacts on stream hydrologic , geomorphic, and biological functions such as, sediment transpo11, nutrient cycling, floodplain interspersion and connectivity, fish spawning, and overall aquatic habitat quality. Livestock can compact soil and disturb or eliminate vegetative cover, decreasing water infiltration and increasing surface runoff and erosion. These effects are magnified on steep slopes or in erosive, unstable soils and would have detrimental effects on stream function. We recommend the EIS include functional or condition assessments for the streams in the project area to help evaluate grazing management alternatives and to help choose the option that would have the least impacts to stream functions. Mitigation Best management practices (BMPs) that could be implemented within the wilderness area would help protect groundwater and surface water resources. We recommend that the EIS include a list of potential mitigation measures with consideration of the following: * Special protections, such as buffer zones, for riparian and wetland resources including springs and fens. * Grazing management to limit deposition of animal waste in and adjacent to water bodies and to maintai n adequate vegetation cover that will prevent excess runoff/erosion into nearby water bodies. * Enhanced monitoring of resource conditions adjacent to high value water resources. * Monitoring to assess effectiveness of BMPs in protecting aquatic resources.		

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Philip Strobel	26	4	Monitoring To help evaluate and adjust grazing management strategies, the EPA also recommends that the EIS include a monitoring section that describes how monitoring will be implemented on an allotment level and at the watershed or sub-watershed level to determine landscape condition (including water quality) status and trends. Monitoring is essential to determine whether grazing management objectives are being achieved and help ensure that water quality is not being adversely affected. An integrated approach to monitoring will evaluate nutrient cycling, soil and water quality, and plant and aquatic community dynamics. A wide array of monitoring options exist, including the use of photo points, vegetation sampling, soil assessments, water quality and quantity analyses, and an assessment of watershed, riparian and stream condition (e.g., NRCS 's Proper Functioning Condition Method). A number of methods are available for monitoring vegetation and for measuring forage utilization and residuals to determine the effects of grazing and browsing on the landscape. In addition to water quality standards, the EPA recommends that the EIS include annual endpoint indicators of resource use (e.g., forage utilization, stubble height, stream bank trampling, woody browse use) related to the desired conditions and triggers (thresholds) for management actions such as modification of intensity, frequency, duration and timing of livestock use; and/or other grazing improvement practices that could be implemented in the wilderness area.	Monitoring	Applicable monitoring protocols have been formalized and used by the Ashley National Forest for many years. Monitoring is an essential component of an adaptive management strategy the Forest uses to assess livestock grazing management in terms of condition and trend. The purpose of adaptive management is to ensure the sustainability of rangeland resources and other ecological services. This strategy was developed by an interdisciplinary team of resource specialists and is a planning and monitoring process that periodically evaluates desired resource conditions and establishes management benchmarks and mitigation measures that would maintain desired resource conditions, or would move unsatisfactory resource conditions toward desired conditions. The benchmarks listed below form a basis for monitoring and are used to compare existing resource conditions to desired conditions. These benchmarks and mitigation measures complement existing Forest Plan standards and guidelines and have been or will be incorporated in Term Grazing Permits by reference to existing or revised Allotment Management Plans. Total ground cover equal to or greater than 85% of potential for all plant communities grazed by livestock. Plant communities dominated by native and selected non-native plant species of moderate to high value for watershed protection (or erosion control) are equal to or greater than 60% of relative cover in plant communities. Selected non-native species are those included in seedings of roadsides, burned areas, and rangelands that have high value for soil protection. These species have generally demonstrated capacity to suppress cheatgrass and other invasive annuals. Dominance includes greater cover, greater frequency, or greater abundance of moderate and high value plants than low value plants. This includes woody species as well as herbaceous species. Documentation associated with photography and other notes as well as

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					measurements from studies are sources for determination of dominance. Forage utilization in alpine areas within and outside the High Uintas Wilderness Area will not exceed 40% (Wilderness Management Plan). In goshawk habitat (forested lands, including transitory openings created by fire), limit understory grazing utilization to an average of 20% by weight, not to exceed 40% on any specific site. Average browse utilization would be limited to 40% by weight, and would not exceed 60%. This standard does not apply to non-forested habitat types (Goshawk Strategy). Leave a 4" or greater stubble height of herbaceous species at the end of the grazing season between greenline and bank full of stream systems. Stream bank stability is equal to or greater than 90% of potential. The five Ashley National Forest sheep allotments under evaluation currently have approximately 771 long-term studies that are permanently established (Fall Creek = 66 studies, Ottoson = 157 studies, Oweep = 129 studies, Painter Basin = 180 studies, Tungsten = 239 studies). Trend and condition were and are determined from those studies that have been revisited at least once following establishment. Condition without trend is indicated from some studies with a single visit. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Older study types that provide background information but are not currently used include site analysis and Parker 3-Step. These methods are used to determine ground cover, plant community composition, forage utilization, riparian and stream bank conditions, water quality, compliance with grazing management practices or other grazing permit and/or annual operating instructions, and any other pertinent desired condition parameters.

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					These methods will continue to be utilized unless better methods are identified by the best available science. Monitoring intervals of long-term studies in the High Uintas Wilderness Area are 10 to 15 years. Over 50 years of monitoring in the alpine and sub-alpine regions of the Uinta Mountains indicate 10 to 15 years as an appropriate visit interval. Under the adaptive management strategy, if monitoring indicates unsatisfactory resource conditions and trends are not moving towards desired conditions, then administrative action(s) is triggered to adjust grazing management. Management adjustments may include but not limited to changes in livestock numbers, season of use, grazing systems, grazing management practices, or allotment improvements.
Philip Strobel	26	5	Climate Change We recommend that the Forest Service use the Counci l on Environmental Quality's (CEQ) December 2014 revised draft guidance for federal agencies' consideration of greenhouse gas (GHG) emissions and climate change impacts at the beginning of the NEPA process to help outline the framework for its analysis of these issues. Accordingly, we recommend that the draft EIS include an estimate of the GHG emissions associated with the project, qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project -related GHG emissions. Affected Environment We recommend that the Draft EIS describe potential changes in the Affected Environment that may result from climate change. Including future climate scenarios in the Draft EIS would help decision makers and the public consider whether the environmental impacts of the alternatives would be exacerbated by climate change and if additional mitigation measures may be warranted. Environmental Consequences As stated above, we recommend estimating the GHG emissions associated with the proposal and its alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ's website (https://ceq.doe.gov/current_developments/GHG_accounting_m	Air and Climate	From the publication, "Assessment of Watershed Vulnerability to Climate change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah" https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr362.pdf "How climate change may exacerbate the effects of grazing will depend on several factors: grazing management, rangeland conditions, demand for grazing, and how forage production is affected by variations in the timing and amount of precipitation during the growing season. Climate change has a high potential of exacerbating the effects of grazing. Warmer temperatures can exacerbate the effects of grazing that reduce riparian vegetation and raise stream temperatures. More intense flooding can exacerbate the effects of increased erosion and destabilized stream banks. More drought can exacerbate the effects of grazing that lowers water tables. Climate change has a high potential of exacerbating the effects of grazing, but grazing management has the potential to offset these effects." Through monitoring of range conditions adjustments can be made as the needs are identified.

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			ethods_ 7Jan2015.html). These emissions levels can serve as a basis for comparison of the alternatives with respect to GHG impacts. We also recommend describing measures to reduce GHG emissions associated with the project including reasonable alternatives or other practicable mitigation opportunities and disclose the estimated GHG reductions associated with such measures. The Draft EIS alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. The EPA further recommends that the Record of Decision commits to implementation of reasonable mitigation measures that would reduce project-related GHG emissions. In addition, we suggest that the lead agencies consider climate adaptation measures based on how future climate scenarios may impact the project in the Draft EIS. The National Climate Assessment (NCA), released by the U.S. Global Change Resource Program (http://nca2014.globalchange.gov), contains scenarios for regions and sectors including transpo1iation. Using NCA or other peer-reviewed climate scenarios to inform alternatives analysis and possible changes to the proposal can improve resilience and preparedness for climate change. The EPA does not recommend comparing GHG emissions from the proposed action to global emissions. As noted by the CEQ revised guidance, "this approach does not reveal anything beyond the nature of the climate change challenge itself: the fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." The EPA also recommends that the lead agencies do not compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a project-level analysis. Consider providing a frame of reference, such as an applicable federal, state, tribal or local goal for GHG emissions reductions, and discuss whether the emissions levels are consistent with such goals.		

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Philip Strobel	26	6	Organization of Document We recommend that all technical reports that lead to conclusions regarding environnental consequences be included as appendices to the NEPA document. The findings can be summarized in the environmental impacts chapter of the EIS with references pointing the reader to the appropriate technical report in the appendices. Providing the technical documents in the appendices as well as information in the environmental impacts chapters helps to ensure a comprehensive picture of the project and its impacts for reviewers, the public and the decision maker.	Position, No Rationale	
Philip Strobel	26	7	We appreciate your consideration of our comments at this early stage of the process. If further explanation of our comments is desired, please contact me at 303-312-6704 or strobel.philip@epa.gov, or you may contact Carol Anderson, the lead reviewer for this project, at 303-312-6058 or anderson.carol @epa.gov.	No Further Response Required	